

Implements of Husbandry Study

*Phase II Addendum Report to the Secretary of the
Wisconsin Department of Transportation*

September 20, 2013



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Prepared by

Wisconsin Department of Transportation

In partnership with

Wisconsin Department of Agriculture, Trade, and Consumer Protection

And with

UW Center for Agricultural Safety and Health
UW-Madison Department of Biological Systems Engineering
UW-Extension Environmental Resource Center
Wisconsin Traffic Operations and Safety Laboratory
Professional Nutrient Applicators Association of Wisconsin
Wisconsin Farm Bureau Federation
Professional Dairy Producers of Wisconsin
Wisconsin Towns Association
Wisconsin County Highway Association
Maxville Truck and Repair
Wisconsin Custom Operators
League of Wisconsin Municipalities
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Executive Summary

From the outset, outreach and education were identified as essential elements of the Implements of Husbandry Study (IoH) Group's work. A subcommittee was established for that goal alone. Upon completion of the proposed recommendations of Phase II study, the group announced five town hall meetings (Madison, Stratford, Cashton, Green Bay and Chippewa Falls) to be held the last two weeks of August and the first week of September. The meetings were intended to:

- Get reaction to the Phase II recommendations.
- Provide education regarding the current Wisconsin laws governing the use of agricultural equipment on roadways.
- Obtain information about the agricultural equipment fleet in operation in the state. Information regarding the true size and numbers of equipment already in use by Wisconsin farmers had proved very difficult to obtain through any official channels. We also wanted to obtain information from local officials regarding the recommendation to require written authorizations for equipment that exceeded the recommended size and weight envelope.

The intent was to solicit feedback, analyze responses and then reconvene the IoH Study Group to make final recommendations that would be advanced to the legislature.

Attendance at the meetings exceeded expectations. The meeting in Green Bay had to be moved to accommodate all participants. Based on interest, a sixth town hall meeting was added in Belmont on Sept 4. In all, over 1,200 farmers, local highway superintendents, custom operators, elected officials and interested citizens attended the six meetings. More than half of the attendees indicated they were farmers and custom operators and a quarter of the town hall attendees were elected officials.

Outreach

The Wisconsin Department of Transportation Office of Public Affairs coordinated news release efforts with the Wisconsin Department of Agriculture, Trade and Consumer Protection to ensure coverage by both the mainstream and agricultural media. The meeting notifications were also shared with the members of the study group, many of them advocacy groups with large constituency. This enabled direct communication with interested stakeholders. The main message was that the study group was soliciting feedback on their initial recommendations.

The town hall meetings received excellent statewide coverage through newspaper, radio and television. In addition to announcing the meetings, reporters attended meetings and again emphasized that the group was inviting feedback.

Feedback mechanisms

Polling was built into the IoH Town Hall PowerPoint presentation to gauge audience make-up and their knowledge of the law, and to obtain fleet details.

A survey was developed and distributed at the town hall meetings. It was also posted online on the new Agricultural Vehicles and Equipment webpage (<http://www.dot.wisconsin.gov/business/ag/index.htm>), allowing anyone who could not attend a meeting to easily provide feedback.

A dedicated email box – IoHStudyFeedback@dot.wi.gov - was also established. The number of responses received from farmers was sufficient to provide statistically significant results.

Awareness of current law

Most participants in the town hall meetings were aware that there was a maximum per axle weight limit for IoH, with almost 60 percent choosing the correct answer of 20,000 pounds. Twenty-two percent of all attendees answered there was no limit. Green Bay had the largest percentage of people who answered no limit at 36 percent. The majority of attendees (80%) knew there was a gross vehicle weight of 80,000 pounds. Yet almost half of the participants (51%) responded they did not know the gross vehicle weight of the largest piece of equipment that they use on the road.

Information of current WI agricultural fleet

The IoH Study Group was unable to obtain quantitative information regarding the equipment used by today's Wisconsin farmer. Information gathered during the town halls and from the surveys was enlightening. Almost 75 percent of the participants of the town halls indicated they had at least one piece of equipment that exceeded the IoH study group's recommendations for envelope size (13'6" Height; 17' Width; 60'/100'/70' Length) and weight limits (23,000 per axle/92,000 lbs. gross vehicle weight).

The surveys provided more detailed information. Half of respondents had equipment that exceeded 13'6" in height. Half of the farmers who had equipment over 15 feet in width, indicated they had equipment that was greater than 19 feet wide. A little more than half (55%) knew the individual axle weight and gross vehicle weight of their largest piece of equipment used on the road and 33 percent indicated that they had an IoH that exceeded 23,000 pounds in individual axle weight or had a gross vehicle weight greater than 92,000 pounds. Again, three-quarters (76%) of respondents indicated they had vehicles that would exceed the recommended size and weight limits.

At the town hall meetings several attendees provided negative feedback regarding the recommended requirement that the operator of any large IoH be at least 18 years old. Two-thirds of the survey respondents said it would create problems for their operation, with one-third indicating it would be manageable. Of those saying it would create problems, about one-half indicated the requirement would have a significant negative impact.

Written Authorization

Less than 20 percent of local officials indicated that they currently issue written authorization for oversize or overweight farm machinery. Over 70 percent indicated they would be able to issue annual written authorizations in a timely manner if authorized to do so.

This information was distributed to the IoH Study Group before its final meeting on September 12. Based on the feedback the group chose to temper their final recommendations (page 7) so as not to unfairly create an economic disadvantage to Wisconsin farmers.

The group agreed that they had been successful in creating awareness of the challenging issues that have been created by the oversize and overweight agricultural equipment in use on today's roads.

There was also consensus that this is an issue that must be advanced to the national level for substantive changes. Tomorrow's solutions must involve agricultural equipment manufacturers, who have indicated they have an interest in developing international or national standards.

Final Recommendations

Final Recommendations: This Phase II Addendum Report does not explicitly establish statutory language; rather, provides guidance through a series of recommendations suggested by the IoH Study Group to update and reflect current agricultural operations in Wisconsin law. The IoH Study Group, by a vote of its members, and while noting additional comments and areas where consensus did not exist, offers the following recommendations:

Clarify the IoH Definition:

- Create a clearer, simpler definition of IoH to reflect today's agricultural equipment.
- All IoH will be exempt from registration.

Example Draft Language: Implement of husbandry" means a self-propelled or towed vehicle manufactured, designed, or reconstructed to be used exclusively in the conduct of agricultural operations and **its primary purpose is for off-highway use**. An "implement of husbandry" includes a farm tractor, self-propelled application-type vehicles (such as a combine, self propelled forage harvester, or self propelled fertilizer application implement), farm wagon, farm trailer, or trailer adapted to tow or pull another implement of husbandry, or any substantially similar equipment used to transport agricultural products necessary for agricultural production.

IoH-CMV Definition:

- Commercial motor vehicles (CMVs) used exclusively for agricultural operations are defined as an "IoH-CMV."
- A self-certification process will be developed and made available for IoH-CMVs.

Example Draft Language: An "implement of husbandry – commercial motor vehicle," or "IoH-CMV" means a reconstructed or principally designed and manufactured vehicle similar to other highway-use vehicles to be used exclusively in the conduct of agricultural operations and **its primary purpose is for off-highway use** is considered to be an implement of husbandry. The term "reconstructed" as used in this subsection means materially altered from the original construction by the removal, addition, or substitution of essential parts, new or used for agricultural purposes. A commercial motor vehicle – implement of husbandry designed for agricultural purposes and used, even temporarily, for non-agricultural purposes shall not be considered an implement of husbandry. An implement of husbandry – commercial motor vehicle is a type of vehicle subject to regulations that are different than an implement of husbandry that is not an IoH- commercial motor vehicle.

Create size limits or an "envelope" for IoH:

Width envelope:

- No width limit for IoH, however if IoH is wide enough that it crosses over the centerline of the roadway during operation then lights and markings are required. This requirement applies the lighting and marking standards of ASAE S279 (American Society of Agricultural Engineers) to **all IoH** (new and those in currently in service, including those purchased used) that operate across

the center line of a public roadway (the centerline of the roadway need not be marked by painted lines for the requirement to apply). Lighting and markings must be visible to traffic bi-directionally.

***Notation:** A majority of the loH Study Group consented with the final width recommendation, but a couple loH Study Group members stated additional feedback was needed from their membership affiliations.*

- Width of loH CMV – 10' (feet). This expanded width allowance is recommended as the maximum envelope for width of these vehicles and is inclusive of any protrusions for chutes, levers, controls, wider wheel gauge and for flotation tires or other configurations to serve the design or conversion to an loH-CMV.

***Notation:** A majority of the loH Study Group consented with the final width recommendation, with an understanding that certain self-propelled fertilizer applicators were most appropriately categorized as loH (category 2) rather than loH-CMV; a maximum width dimension for that specific type of self propelled loH may be necessary to avoid unintended consequences of allowing greater widths for this type of equipment. As with the first width recommendation, some loH Study Group members stated additional feedback was needed from their membership affiliations.*

Height envelope:

- No height limit, however the loH operator remains responsible for ensuring safe clearance of any overhead obstructions.

Length envelope:

- 60' (feet) for a single loH and 100' (feet) for combinations of two loH. For combinations of three loH the limit is 70' (feet), but a three loH combination may operate at lengths exceeding 70' (feet) to a limit of 100' (feet) at a speed no greater than 20 miles per hour (mph).

***Notation:** There was a majority of loH Study Group members that supported allowing combinations of three loH to operate from 70' (feet) up to 100' (feet) at a reduced speed (20 mph), but a few loH Study Group members, including WisDOT, declined to support this provision without additional research on operational impacts including braking and connection requirement, and concerns about affects on safe operations.*

loH Weight:

loH is given an expanded 15% weight allowance over the limits as established by the Federal Bridge Formula, except where posted and during periods of spring thaw. This equates to a maximum single axle weight of 23,000 pounds and a maximum gross vehicle weight of 92,000 pounds. A new loH weight table will be created to (e.g. 348.30 reflect the 15% allowance based on gross vehicle weight, axle weight and spacing.

Written Authorization:

Written authorization to exceed weight limits may be requested on an annual basis from the maintaining authority of the roadways. Written authorizations may only be granted when:

- A travel or route plan for the IoH is submitted.
- Additional conditions may be set by each maintaining authority (local or state) for the roadway on which the IoH is operating within the context of the written authorization.
- IoH vehicles operating in excess of the 15% allowance will be fined for the amount in excess of standard gross motor vehicle weight or individual axle weight.

Notation: While half of the IoH Study Group supported this recommendation, the other half did not take a position on this issue. Concern centered on the logistics of obtaining authorization from multiple jurisdictions. Forty percent of farmers and custom operators who responded to the survey said they travel on roadways in four or more municipalities.

This recommendation was advanced as a mechanism to foster communication between local officials and IoH operators. Local officials repeatedly expressed their concern over the operation of overweight equipment on roads under their jurisdiction. Local officials felt strongly that they had to retain the authority to control use of their roadways to preserve the public investment and provide safe roads for all users. Written authorization would provide a means for overweight IoH to still operate on Wisconsin roadways.

Support for Best Practices:

- Support exploration of best practices to assist in reducing the wear of roadways and structures. This includes supporting the development of emerging innovations and best practices in manure management.
 - Propose statutory changes that also provide authority for longitudinal accommodation. Create broad authority to issue permits to accommodate pipelines for liquid manure/nutrients including longitudinally in right of way when need is demonstrated, under specific conditions.

Age of Operator Requirements:

- Age requirements are to remain as presently allowed in statute, however, provide an option for advanced training for operating an oversize/overweight IoH.

Ongoing IoH Study Group: Establish a standing IoH Study Group under the direction of the WisDOT Secretary with participation of DATCP to bring together stakeholders affected by issues related to transportation and agriculture. The forum will focus on encouraging broad stakeholder participation to address transportation needs and impacts related to agriculture.

Remaining Issues for Review: The following issues will be addressed in future reports:

- Use of “tracked” IoH

- Ability to cite vehicles for passing on a double-yellow line; consider provision for reporting unsafe passing
- Slow Moving Vehicle (SMV) emblems
- Education & Outreach
- Hours of Operation (night time and weekend restrictions)
- Semi vs. Straight Truck (regulations differ based on type of operation)
- Regional and National standards [Federal Highway Administration (FHWA)/American Association of State Highway Traffic Officials (AASHTO)] for envelope of IoH
- Public service announcements and marketing of traffic safety messages and driver awareness of agricultural equipment operations on roadways during planting and harvest seasons
- Expansion of driver's education courses and/or materials to include more on vehicle/IOH interactions
- Opportunities to encourage national or international standards for agricultural equipment that recognize limitations of public roadways to accommodate large and heavy vehicles and that may assist in promoting engineering solutions to the weight and other challenges for safe roadway operation

Engineering Research Needs:

Within the tight timeframe of the study, the engineers were able to study the magnitude, repetitions and spacing of axle weights of vehicles and the effects of pavements and structures. Studies by Iowa and Minnesota Department of Transportation have produced similar findings in respect to damage and reduced lifecycles. The engineering analysis recommended by the engineering sub-group is preliminary and some additional research is still needed. The additional research needs include:

- Distribution factors related to specific types of IoH equipment to be used in the analysis of bridges;
- Impact factors related to IoH type equipment to be used in the analysis of bridges;
- Design code provisions for the inclusion of the effects of IoH on the design of new structures;
- Methods to retrofit existing structures that were designed with lower load configurations or have experience deterioration that has reduced the load capacity of the structure below the needs of IoH equipment; and
- Differential impacts of floatation tires.

Appendix A: Survey Results

Implements of Husbandry - Survey Results (Overall)

Last Updated: 09/11/2013

Total Surveys: 532

Confidence Level: 99% - Confidence Interval: +/- 7% - Population: 76,800 - Sample: 338

FARMER/CUSTOM OPERATOR SECTION			Total: 364
	ANSWER:	PERCENTAGE:	
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer	242	68	
B) Custom Operator	15	4	
C) Both a Farmer & Custom Operator	101	28	
Total	358	100	
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile	15	4	
B) Between one mile and two miles	28	8	
C) Between two miles and three miles	53	15	
D) Greater than five miles	267	73	
Total	363	100	
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One	86	25	
B) Two	67	20	
C) Three	54	15	
D) Four or more	141	40	
Total	348	100	
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes	307	85	
B) No	56	15	
Total	363	100	
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet	19	6	
B) 17 feet	44	14	
C) 18 feet	91	30	
D) Greater than 19 feet	153	50	
Total	307	100	
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes	247	70	
B) No	111	30	
Total	358	100	
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet	97	40	
B) Greater than 19 feet	150	60	
Total	247	100	
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes	190	53	
B) No	171	47	
Total	361	100	
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet	59	30	
B) 15 feet	63	34	
C) 16 feet	39	20	
D) Greater than 17 feet	31	16	
Total	192	100	

10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	110	31
B) No	248	69
Total	358	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (IoH)?		
A) 60 feet to 65 feet	26	23
B) 65 feet to 70 feet	35	32
C) 70 feet to 75 feet	24	20
D) Greater than 75 feet	27	25
Total	112	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	152	43
B) No	202	57
Total	354	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (IoH) that you use on the road?		
A) Yes	197	55
B) No	162	45
Total	359	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	112	33
B) No	231	67
Total	343	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	155	46
B) No	180	54
Total	335	100
16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations of three IoH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	82	24
B) One to Three	122	34
C) Four to Five	54	15
D) More than Five	94	27
Total	352	100
17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating IoH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	116	35
B) Yes, with significant impact	115	33
C) No	109	32
Total	340	100
LOCAL OFFICIALS SECTION:		
Total: 168		
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	132	82
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	29	18
Total	161	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	26	18

B) No	121	82
Total	147	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	106	78
B) One to Five (1 to 5)	14	10
C) Five to Ten (5 to 10)	10	7
D) Ten or Greater (10+)	5	5
Total	135	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	89	72
B) No	35	28
Total	124	100
<u>Comments (Farmer/Custom Operator)</u>	<i>Please see each tab for detailed comments.</i>	
Total	114	
<u>Comments (Local Officials)</u>	<i>Please see each tab for detailed comments.</i>	
Total	30	

See the website - <http://www.dot.wisconsin.gov/business/ag/index.htm> - for individual Town Hall results

Implements of Husbandry - Survey Results (Madison TH)

Last Updated: 08/30/2013

Total Surveys:

64

FARMER/CUSTOM OPERATOR SECTION		Total: 51
	ANSWER:	PERCENTAGE:
1. How do you describe yourself? (Please check the one option that describes you)		
A) Farmer	31	61
B) Custom Operator	1	1
C) Both a Farmer & Custom Operator	19	38
Total	51	100
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?		
A) Less than a mile	0	0
B) Between one mile and two miles	2	4
C) Between two miles and three miles	5	10
D) Greater than five miles	44	86
Total	51	100
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?		
A) One	6	13
B) Two	10	20
C) Three	4	8
D) Four or more	29	59
Total	49	100
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?		
A) Yes	48	94
B) No	3	6
Total	51	100
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?		
A) 16 feet	5	12
B) 17 feet	2	4
C) 18 feet	15	29
D) Greater than 19 feet	27	55
Total	49	100
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?		
A) Yes	41	84
B) No	8	16
Total	49	100
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?		
A) 18 feet	14	43
B) Greater than 19 feet	28	57
Total	42	100
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?		
A) Yes	32	64
B) No	18	36
Total	50	100
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?		
A) 14 feet	9	26
B) 15 feet	13	38
C) 16 feet	10	29
D) Greater than 17 feet	2	10

Total	34	100
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	18	37
B) No	31	63
Total	49	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (loH)?		
A) 60 feet to 65 feet	6	33
B) 65 feet to 70 feet	5	28
C) 70 feet to 75 feet	4	22
D) Greater than 75 feet	3	17
Total	18	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	10	20
B) No	39	80
Total	49	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (loH) that you use on the road?		
A) Yes	27	54
B) No	23	46
Total	50	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	19	39
B) No	30	61
Total	49	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	28	61
B) No	18	39
Total	46	100
16. Per the loH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single loH)/100 feet in length (combination of two loH)/70 feet in length (combinations of three loH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	6	13
B) One to Three	16	31
C) Four to Five	13	25
D) More than Five	16	31
Total	51	100
17. Would a requirement for the loH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating loH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	18	36
B) Yes, with significant impact	21	42
C) No	11	22
Total	50	100
LOCAL OFFICIALS SECTION:		
Total: 13		
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	10	77
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	3	23

Total	13	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	0	0
B) No	11	100
Total	11	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	9	100
B) One to Five (1 to 5)	0	0
C) Five to Ten (5 to 10)	0	0
D) Ten or Greater (10+)	0	0
Total	9	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	5	71
B) No	2	29
Total	7	100

Comments (Farmer/Custom Operator)

1) Future Family/Employees for Question 17?

2) In the event of having to bring a piece of equipment to a dealer for service, I wouldn't know all the different agencies I would have to contact to be in compliance. Unhooking the header on a combine multiple times per day would be a major safety concern.

3) You have underestimated the size of the equipment currently on the road today. 20-24' width would be much more acceptable. 18' equipment has been the standard for 20+ years.

4) More rules, more laws, more law breakers.

5) We as farmers need to respect the roads. Not only farmers use them or paid for them.

6) Curbing concentrated farming operations (CAFO), would reduce rural road destruction. Concentrated equals concentrated traffic equals overtraveled (sp.) and abused roads. State and Federal Governments have dragged ass for the last 50 years. Instead of holding back agriculture, push the governments.

7) Height and width restrictions would be an issue. I worry that each town we pass (4 in all) may implement rules differently. Plus we farm on town, county, and state roads and have 13 different farm sites.

8) Permits? I'm a farmer who operates in four counties. What about tracks?

9) The future of agriculture in Wisconsin will be affected by this. Please do not over control. Educate urban and city folks.

10) The common driver needs to be educated on equipment being on the road. There needs to be more signs telling drivers that we are there. Something to think about: do you eat and have clothes than leave us alone.

11) The US wants cheap food, farmers can not pass on their cost like souerment (misspelled?). The utilities companies should be responsible for any wires caslow (misspelled?). Put them higher why do we having tractor safety in kinds can't drive there parents equipment. People should learn to drive. Not on cell phone and texting. No farms, no food. People will be hungry in this country. Drivers should be ware farmers have rights to the road and should know what SMV signs stand for. This will hurt all farmers small and significant - tired and the mercury mark (?). This will kill farmers and slowly PD will that state.

12) The process of obtaining written permission would be very difficult. Tracking down the right people would take considerable time and effort. I have no extra time to be looking for the correct people to get permits to do my job in a timely manner. When the sun is shining, I need to get work done, not get permitted.

13) The process of written permission with a route makes no sense. Routes are changing hourly and can not be anticipated ahead. DO NOT let this IOH CMV law fall on the farmer. Lets get the equipment manufacturers to size the equipment appropriately.

14) I think width should be 22 feet. I think drivers need to be educated more about IOH.

15) Width needs to go up to 22 feet. Farmers need to yield. I agree with weight limits. Motorists need to learn about SMV operations.

16) These recommendations would causes a lot of problems for farmers that at this time are not causing problems for other people.

17) As a town chair our current town road budget is not enough to maintain roads at current standards, raise the standards and costs will go up at the local level.

18) We are solving one problem and creating multiple other with multiple safety hazards. More accidents will happen with those rules.

19) What about the other people using the roads that block traffic and don't pay any tax or fee for the roads.

20) Motorists need to slow down. They don't know what a SMV sign is. Bicycles don't abide by any of the laws of the road.

Total 20 comments from 51 surveys.

Comments (Local Officials)

1) Part time local town officials all have full time other employment. We are not around to answer the phone to issue permits. Permits are going to be a problem.

2) Since these are unlicensed vehicles, there is no contribution (earmarked) to offset costs of wear and tear. As it is, road aids only cover 40% of our highway construction/repair costs. Rest comes from GPR which is limited by use value assessment law.

3) We just need farmers and custom operators to work with us. We have allowed travel on the roads with spring time load limits. Farmers and others with weight problems just need to talk to us. All of these allowable weight limits assumes that our roads are never and in good repair. Many of our rural roads can not handle the weight or the repetitions. We know how to build the roads, just need lots of dollars.

Total 3 comments from 13 surveys.

Implements of Husbandry - Survey Results (Stratford TH)

Last Updated: 08/30/2013

Total Surveys:

65

FARMER/CUSTOM OPERATOR SECTION		Total: 38
	ANSWER:	PERCENTAGE:
1. How do you describe yourself? (Please check the one option that describes you)		
A) Farmer	27	71
B) Custom Operator	0	0
C) Both a Farmer & Custom Operator	11	29
Total	38	100
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?		
A) Less than a mile	3	8
B) Between one mile and two miles	7	18
C) Between two miles and three miles	6	16
D) Greater than five miles	22	58
Total	38	100
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?		
A) One	14	38
B) Two	8	22
C) Three	4	11
D) Four or more	11	29
Total	37	100
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?		
A) Yes	26	68
B) No	12	32
Total	38	100
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?		
A) 16 feet	1	4
B) 17 feet	9	35
C) 18 feet	4	15
D) Greater than 19 feet	12	46
Total	26	100
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?		
A) Yes	16	42
B) No	22	58
Total	38	100
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?		
A) 18 feet	4	25
B) Greater than 19 feet	12	75
Total	16	100
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?		
A) Yes	15	39
B) No	23	61
Total	38	100
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?		
A) 14 feet	2	14
B) 15 feet	5	33
C) 16 feet	3	20
D) Greater than 17 feet	5	33

Total	15	100
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	8	21
B) No	30	79
Total	38	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (IoH)?		
A) 60 feet to 65 feet	2	25
B) 65 feet to 70 feet	2	25
C) 70 feet to 75 feet	2	25
D) Greater than 75 feet	2	25
Total	8	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	14	38
B) No	23	62
Total	37	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (IoH) that you use on the road?		
A) Yes	20	53
B) No	18	47
Total	38	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	10	26
B) No	28	74
Total	38	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	11	31
B) No	25	69
Total	36	100
16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations of three IoH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	20	54
B) One to Three	13	36
C) Four to Five	2	5
D) More than Five	2	5
Total	37	100
17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating IoH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	8	23
B) Yes, with significant impact	12	34
C) No	15	43
Total	35	100
LOCAL OFFICIALS SECTION:		
Total: 27		
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	26	100
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	0	0

Total	26	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	12	45
B) No	15	55
Total	27	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	13	52
B) One to Five (1 to 5)	4	16
C) Five to Ten (5 to 10)	6	24
D) Ten or Greater (10+)	2	8
Total	25	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	19	83
B) No	4	17
Total	23	100

Comments (Farmer/Custom Operator)

- 1) Will farmers concerned about weight put small light tractors or equipment to be under the weight limit be a safety hazard because weight on a power unit makes it stable.
- 2) Seems like it is a problem with manure hauling, why put more regulation on everyone?
- 3) I agree. Local town officials have to keep weight off the roads. They are not built to handle it.
- 4) Don't allow roads already in poor conditions to be damaged more.
- 5) Any loH that are over 12 ft in width should be permitted because a lot of rural roads are only 22 feet to 24 feet wide when they meet oncoming traffic. The loH has tires. Hanging over the shoulder of road, the road should be one way for safety.
- 6) This whole things is a joke to the farmer.

Total 6 comments from 38 surveys.

Comments (Local Officials)

- 1) No weight increase. Roads take a pounding now. We do not get additional state money for roads to offset road repairs.
- 2) Make it mandatory for county law enforcement officers to weight any loH that town officials are suspicious of being over weight.
- 3) Please don't roads to be damaged because of greed.
- 4) Too many people just want to have no restrictions on what they want to do.

Total 4 comments from 27 surveys.

Implements of Husbandry - Survey Results (Cashton TH)

Last Updated: 08/30/2013

Total Surveys:

29

FARMER/CUSTOM OPERATOR SECTION		Total:	23
		ANSWER:	PERCENTAGE:
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer		13	57
B) Custom Operator		2	8
C) Both a Farmer & Custom Operator		8	35
Total		23	100
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile		1	4
B) Between one mile and two miles		3	13
C) Between two miles and three miles		5	22
D) Greater than five miles		14	61
Total		23	100
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One		8	35
B) Two		4	17
C) Three		3	13
D) Four or more		8	35
Total		23	100
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes		17	74
B) No		6	26
Total		23	100
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet		3	17
B) 17 feet		3	17
C) 18 feet		7	42
D) Greater than 19 feet		4	24
Total		17	100
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes		11	50
B) No		11	50
Total		22	100
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet		8	73
B) Greater than 19 feet		3	27
Total		11	100
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes		11	48
B) No		12	52
Total		23	100
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet		3	28
B) 15 feet		4	36
C) 16 feet		0	0

D) Greater than 17 feet	4	36
Total	11	100
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	4	18
B) No	18	82
Total	22	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (loH)?		
A) 60 feet to 65 feet	1	20
B) 65 feet to 70 feet	2	40
C) 70 feet to 75 feet	1	20
D) Greater than 75 feet	1	20
Total	5	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	11	48
B) No	12	52
Total	23	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (loH) that you use on the road?		
A) Yes	11	50
B) No	11	50
Total	22	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	7	30
B) No	16	70
Total	23	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	5	23
B) No	17	77
Total	22	100
16. Per the loH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single loH)/100 feet in length (combination of two loH)/70 feet in length (combinations of three loH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	5	24
B) One to Three	9	43
C) Four to Five	3	14
D) More than Five	4	19
Total	21	100
17. Would a requirement for the loH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating loH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	8	42
B) Yes, with significant impact	3	16
C) No	8	42
Total	19	100
LOCAL OFFICIALS SECTION:		
Total:	6	
1. How do you describe yourself? (Please circle the one option that best describes you)		

A) Non-elected or Elected Local Government Official	3	50
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	3	50
Total	6	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	1	33
B) No	2	67
Total	3	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	2	67
B) One to Five (1 to 5)	1	33
C) Five to Ten (5 to 10)	0	0
D) Ten or Greater (10+)	0	0
Total	3	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	2	67
B) No	1	33
Total	3	100

Comments (Farmer/Custom Operator)

- 1) I am a older semi-retired farmer. Most incidents on this form do not affect me, however, I have relatives and neighbors that it is of great concern.
- 2) Change the law to allow operation at night and on weekends. Is safe for both cars and IoH.
- 3) We need to also deal with the times of operation. As moving large equipment may be safer at night with guide vehicles than during the peak day travel times.
- 4) What is considered best practice for town road width? One township does not want to widen roads. Thanks for clearing up registration requirements.

Total 4 comments from 23 surveys.

Comments (Local Officials)

- 1) Please consider a guideline or training to educate on permit authorization and issuing. Some type or county permit for over width, but local control of weight and bridges.
- 2) Over width season long. Ag. only permit for sprayers and floaters.

Total 2 comments from 6 surveys.

Implements of Husbandry - Survey Results (Green Bay TH)

Last Updated: 08/30/2013

Total Surveys:

71

FARMER/CUSTOM OPERATOR SECTION		Total:	56
		ANSWER:	PERCENTAGE:
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer		37	66
B) Custom Operator		1	2
C) Both a Farmer & Custom Operator		18	32
	Total	56	100
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile		0	0
B) Between one mile and two miles		4	7
C) Between two miles and three miles		9	16
D) Greater than five miles		43	77
	Total	56	100
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One		11	20
B) Two		10	18
C) Three		12	22
D) Four or more		22	40
	Total	55	100
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes		53	95
B) No		3	5
	Total	56	100
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet		3	6
B) 17 feet		8	15
C) 18 feet		10	19
D) Greater than 19 feet		31	60
	Total	52	100
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes		46	82
B) No		10	18
	Total	56	100
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet		17	38
B) Greater than 19 feet		28	62
	Total	45	100
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes		35	63
B) No		21	37
	Total	56	100
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet		14	41
B) 15 feet		11	32
C) 16 feet		5	15

D) Greater than 17 feet	4	12
Total	34	100
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	18	34
B) No	36	66
Total	54	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (IoH)?		
A) 60 feet to 65 feet	5	29
B) 65 feet to 70 feet	9	53
C) 70 feet to 75 feet	2	12
D) Greater than 75 feet	1	6
Total	17	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	22	42
B) No	30	58
Total	52	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (IoH) that you use on the road?		
A) Yes	25	45
B) No	31	55
Total	56	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	16	29
B) No	39	71
Total	55	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	30	53
B) No	26	47
Total	56	100
16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations of three IoH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	10	18
B) One to Three	23	42
C) Four to Five	10	18
D) More than Five	12	22
Total	55	100
17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating IoH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	20	36
B) Yes, with significant impact	20	36
C) No	15	28
Total	55	100
LOCAL OFFICIALS SECTION:		
Total:	15	
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	11	85

B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	2	15
Total	13	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	1	8
B) No	12	92
Total	13	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	12	92
B) One to Five (1 to 5)	1	8
C) Five to Ten (5 to 10)	0	0
D) Ten or Greater (10+)	0	0
Total	13	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	6	50
B) No	6	50
Total	12	100

Comments (Farmer/Custom Operator)

- 1) Many combines in use measure 17' on the wheels.
- 2) The problem is not large machinery - it is important, impolite motorists who pay no attention to warning lights and turn signals.
- 3) You should base loads on weight per square inch on the roadway. An 8 wheel manure tanker pulled with a dual wheel farm tractor has a very little foot print. Cut state construction operator's wages to \$25 per hour from 42, give money to town's for roads.
- 4) Thank you for having these meetings and trying to find a solution.
- 5) Don't understand why permit makes things safe. Example: 20 ft. combine goes down 22 ft. road - 8 cars behind if farmer has permit, will they be any happier.
- 6) If there is a weight issue on manure haulers find a happy medium, but don't try to re imemt (sp?) the wheel on the rest of the loH equipment for this will cripple the ag. industry in this state and who will enforce the laws and are we all going to be criminals and do they just want the fine money or permit money.
- 7) Some local authority will be abused. A state statute will be more effective and fair. I'm also a town chairman and I know several in my county who have dealt with this issue differently depending on who it applies to. Limit permit fees to \$5.00 or \$15.00 per year. Rubber track machines should count as 3 axles.
- 8) Have the weight and width limits with no limits. loH CMV looks like a good idea. Grandfather all loH vehicles up to this point.
- 9) I think the loaded weight of loH's are more of an issue than the length or width of an implement. Loaded manure tankers breakup roads and cost municipalities money. With proper lighting, width and length can be a manageable issue to deal with. Educate the general population on safety around farm equipment on roadways.
- 10) Written statement received (see attached).
- 11) Please allow us to possibly use a used squad car or lights equal when moving down the road. For safety sake - I know the police depts. Are busy and under-staffed. Motorists are not acting in a safe manner.
- 12) Please stay away from permits - They cost farmers and government entities a lot of valuable time and expense, but do not actually make the travel any safer. Make new regulations for weight and width without permits.

13) Special permits for height and width I don't think are necessary if they are safe and life (sp.) correctly by manufacturers. Weight is the main problem.

14) This would be the end of a lot of farmers. Including me.

15) Many pieces of equipment are wide and some are too high.

16) 22 feet width.

Total 16 comments from 56 surveys.

Comments (Local Officials)

1) We didn't have a count on how many would be needed (permits) at this time.

2) A submitted letter from the town of Franklin (see attached).

Total 2 comments from 15 surveys.

Implements of Husbandry - Survey Results (Chippewa Falls TH)

Last Updated: 09/04/2013

Total Surveys:

86

FARMER/CUSTOM OPERATOR SECTION		Total: 49	
		ANSWER:	PERCENTAGE:
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer		33	67
B) Custom Operator		2	4
C) Both a Farmer & Custom Operator		14	29
	Total	49	100
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile		1	2
B) Between one mile and two miles		4	8
C) Between two miles and three miles		8	17
D) Greater than five miles		35	73
	Total	48	100
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One		8	17
B) Two		18	38
C) Three		8	17
D) Four or more		13	28
	Total	47	100
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes		42	86
B) No		7	14
	Total	49	100
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet		1	2
B) 17 feet		2	5
C) 18 feet		15	36
D) Greater than 19 feet		24	57
	Total	42	100
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes		38	78
B) No		11	22
	Total	49	100
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet		11	29
B) Greater than 19 feet		27	71
	Total	38	100
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes		27	55
B) No		22	45
	Total	49	100
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet		9	32
B) 15 feet		5	18
C) 16 feet		7	25
D) Greater than 17 feet		7	25

Total	28	100
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	21	44
B) No	27	56
Total	48	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (IoH)?		
A) 60 feet to 65 feet	3	13
B) 65 feet to 70 feet	9	41
C) 70 feet to 75 feet	2	10
D) Greater than 75 feet	8	36
Total	22	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	30	63
B) No	18	37
Total	48	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (IoH) that you use on the road?		
A) Yes	36	73
B) No	13	27
Total	49	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	19	39
B) No	30	61
Total	49	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	20	42
B) No	28	58
Total	48	100
16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations of three IoH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	12	26
B) One to Three	12	26
C) Four to Five	8	18
D) More than Five	14	30
Total	46	100
17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating IoH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	23	52
B) Yes, with significant impact	7	16
C) No	14	32
Total	44	100
LOCAL OFFICIALS SECTION:		
Total:	37	
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	33	92

B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	3	8
Total	36	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	5	14
B) No	30	86
Total	35	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	25	78
B) One to Five (1 to 5)	4	13
C) Five to Ten (5 to 10)	3	9
D) Ten or Greater (10+)	0	0
Total	32	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	28	88
B) No	4	12
Total	32	100

Comments (Farmer/Custom Operator)

- 1) Most equipment don't have lights; don't farmers have to update this and who is going to pay the cost?
- 2) 14'6" high would be good. 20' wide. Over width left turn with impatient motorists do not watch left blinker.
- 3) Height should be 14' for all loH proposed. Width should be left as the existing law for loH. Tractor width should be 15' feet.
- 4) Authorization for permits on over width permits town or county officials is going to be judged on personal beliefs not public's best interests. State needs to make guidelines for permitting this so there is not a grey area and make it black and white.
- 5) Tractor safety courses should be mandatory for any body - like hunter safety. 16 year olds with 2 or 4 years of farm equipment operation often have more experience of large farm equipment operation/traffic tendencies of city drivers. Than a person 18 years old and a valid drivers license. Therefore, I think 2 years of tractor safety certification may be more useful than 18 years of age.
- 6) Concerned about extra staff needed to keep track of written authorization at township level and what plan has to expand beyond 4 townships. 15' to 17'6" is too narrow and to get local control to approve will be difficult. Weight limits are too low given types of equipment that we have. Tractor axles are no plentiful enough to meet bridge laws.
- 7) How are you going to address machines that are 21' in width (ie self-propelled windrowers for cutting hay 3-5 times per year)?
- 8) Operator should have CDL. Bonds could be used for overweight farming - has evolved into a commercial business. I think that the rules should start to conform to CMV rules. Equipment should be broken down for transport. Why should all taxpayers bear the burden of farmers efficiency. Road repair costs have skyrocketed. Tractor safety courses should be changed, because equipment has.
- 9) Resounding "yes" to the suggestion of students in driver's ed learning rural driving/around equipment! Others sitting around us in the crowd agreed. Tractor safety requirements also very important.
- 10) 13'6" should be 14' in height. For combine's grain carts. No written authorization above? 18' width would be more real. Thanks for the meeting.
- 11) Will the DOT continue to sell overweight permits or is 92K the total weight allowed by law (CMVs)?

12) 1909 public street was deemed as a street public has a right to use - right to use. No age requirement. I operate under my own authority.

Total 12 comments from 49 surveys.

Comments (Local Officials)

1) Increase width to 18' for loH.

2) I am a town chairman of a town with over 100 miles of town roads. Added responsibilities of loH permitting would be a significant burden for me and other town officials. In addition, many local officials don't have the knowledge and experience to analyze equipment weights and appropriate road load bearing capacities. Consider having counties handle permitting. They are more likely to have trained/professional staff to judge equipment weights and road load bearing capacities. - Dennis Ferstenou, Chair, Town of Eagle Point (Chippewa County).

3) I believe if the loH Equipment is being moved 2 or less miles on a town road from/farm that a permit should not be required (this applies to over width) daytime only. The 92,000 lbs. overweight should only apply in spring planting/manure hauling (spring would depend on north or south/temperature).

4) Enforcement, who pays for it?

Total 4 comments from 37 surveys.

Implements of Husbandry - Survey Results (Belmont TH)

Last Updated: 09/05/2013

Total Surveys: 100

FARMER/CUSTOM OPERATOR SECTION		Total: 63	
		ANSWER:	PERCENTAGE:
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer		45	71
B) Custom Operator		3	5
C) Both a Farmer & Custom Operator		15	24
Total		63	100
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile		6	10
B) Between one mile and two miles		4	6
C) Between two miles and three miles		8	13
D) Greater than five miles		45	71
Total		63	100
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One		19	32
B) Two		6	10
C) Three		7	12
D) Four or more		27	46
Total		59	100
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes		51	82
B) No		11	18
Total		62	100
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet		2	4
B) 17 feet		11	22
C) 18 feet		22	43
D) Greater than 19 feet		16	31
Total		51	100
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes		39	65
B) No		21	35
Total		60	100
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet		24	62
B) Greater than 19 feet		15	38
Total		39	100
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes		28	45
B) No		34	55
Total		62	100
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet		7	25
B) 15 feet		13	46
C) 16 feet		5	18
D) Greater than 17 feet		3	11

Total	28	100
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	20	32
B) No	43	68
Total	63	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (IoH)?		
A) 60 feet to 65 feet	4	19
B) 65 feet to 70 feet	3	15
C) 70 feet to 75 feet	7	33
D) Greater than 75 feet	7	33
Total	21	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	23	37
B) No	39	63
Total	62	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (IoH) that you use on the road?		
A) Yes	32	52
B) No	29	48
Total	61	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	14	23
B) No	46	77
Total	60	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	22	39
B) No	34	61
Total	56	100
16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations of three IoH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	15	25
B) One to Three	19	32
C) Four to Five	7	12
D) More than Five	18	31
Total	59	100
17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating IoH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	11	20
B) Yes, with significant impact	26	47
C) No	18	33
Total	55	100
LOCAL OFFICIALS SECTION:		
Total:	37	
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	30	81

B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	7	19
Total	37	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	5	17
B) No	24	83
Total	29	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	23	79
B) One to Five (1 to 5)	3	10
C) Five to Ten (5 to 10)	1	4
D) Ten or Greater (10+)	2	7
Total	29	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	15	63
B) No	9	37
Total	24	100

Comments (Farmer/Custom Operator)

- 1) No permits - they are a waste of time and money for farmers and towns. Please change time restriction on tractors over 12 feet in width. This is a huge liability for farmers.
- 2) What is the farmer is less than 18 years old?
- 3) Does speed impact road and bridge damage? Limit time of day over width implements can travel.
- 4) If a farm implement has all the lighting equipment and someone hits you are you liable? Quad trac tractors need to be legal.
- 5) Quad trac tractors on Highways have to be legal. Width of 17'6" for 6 row corn planters is common and should be legal. Tractor safety is 14, with 6 months experience is good. Question 17 is way off being 18 and drivers license. Farmers work around the clock, get rid of timelines.
- 6) If a 16 year old has training allow them on the road.
- 7) I farm with my brother on a crop farm through 5 counties. There is no hired help and we compensate lack of excess labor with large, efficient equipment. These regulations would effectively end my farming career due to the lack of available close land and the inefficient manner in which I would have to wait for municipal authorization (I am 29 years old).
- 8) If we are worried about weight do it, but every 6 row corn head or 6 row corn planter in use is 16-17 feet wide (the 6 row is the most common size) nearly 85-90% of farmers would have to get permits. It will create problems for townships, cities, farmers - leave the width alone.
- 9) Width and length permits are B.S.
- 10) Some 14 year olds operate better than 50-60 year olds.

Total 10 comments from 63 surveys.

Comments (Local Officials)

- 1) We have one full time clerk/ treasurer/ administrator that helps a lot.
- 2) Make a recommendation to give some sort of tax credit to the farmers that use drag lines or pipelines for manure to help keep more manure off the roads.

3) Permits for weight hopefully are the same from one township to the next.

4) Town officials have too much to do now.

5) We have recently posted our roads as class B. There has been an increasing amount of road damage in recent years. There has to be local control. As towns can not keep up with the increased cost of road repair.

6) Will these exceptions be granted to other types of businesses?

7) Question 17 - what is timely? We currently can issues permits within 30 min. if a requester uses a fax machine or requests one in person.

Total 7 comments from 37 surveys.

Implements of Husbandry - Survey Results (Online)

Last Updated: 09/10/2013

Total Surveys:

66

FARMER/CUSTOM OPERATOR SECTION			Total: 48
	ANSWER:	PERCENTAGE:	
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer	29	69	
B) Custom Operator	2	5	
C) Both a Farmer & Custom Operator	11	26	
Total	42	100	
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile	4	8	
B) Between one mile and two miles	3	6	
C) Between two miles and three miles	6	12	
D) Greater than five miles	35	73	
Total	48	100	
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One	12	27	
B) Two	6	14	
C) Three	10	23	
D) Four or more	16	36	
Total	44	100	
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes	38	79	
B) No	10	21	
Total	48	100	
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet	2	5	
B) 17 feet	4	11	
C) 18 feet	9	24	
D) Greater than 19 feet	23	61	
Total	38	100	
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes	32	67	
B) No	16	33	
Total	48	100	
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet	8	25	
B) Greater than 19 feet	24	75	
Total	32	100	
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes	26	55	
B) No	21	45	
Total	47	100	
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet	12	46	
B) 15 feet	7	27	
C) 16 feet	3	12	
D) Greater than 17 feet	4	15	
Total	26	100	
10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?			

A) Yes	11	23
B) No	37	77
Total	48	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (IoH)?		
A) 60 feet to 65 feet	3	27
B) 65 feet to 70 feet	3	27
C) 70 feet to 75 feet	3	27
D) Greater than 75 feet	2	18
Total	11	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	25	53
B) No	22	47
Total	47	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (IoH) that you use on the road?		
A) Yes	28	60
B) No	19	40
Total	47	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	14	42
B) No	19	58
Total	33	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	17	49
B) No	18	51
Total	35	100
16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations of three IoH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	11	23
B) One to Three	13	27
C) Four to Five	8	17
D) More than Five	16	33
Total	48	100
17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating IoH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	14	29
B) Yes, with significant impact	14	29
C) No	20	42
Total	48	100
LOCAL OFFICIALS SECTION:		Total: 18
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	7	47
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	8	53
Total	15	100
2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		

A) Yes	1	6
B) No	17	94
Total	18	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversized or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	11	92
B) One to Five (1 to 5)	1	8
C) Five to Ten (5 to 10)	0	0
D) Ten or Greater (10+)	0	0
Total	12	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	7	64
B) No	4	36
Total	11	100
Overall Comments		
31 Comments from 66 Surveys.		
<i>Comments not yet available.</i>		

Implements of Husbandry - Survey Results (Mail)

Last Updated: 09/11/2013

Total Surveys:

51

FARMER/CUSTOM OPERATOR SECTION			Total: 36
	ANSWER:	PERCENTAGE:	
1. How do you describe yourself? (Please check the one option that describes you)			
A) Farmer	27	75	
B) Custom Operator	4	11	
C) Both a Farmer & Custom Operator	5	14	
Total	36	100	
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other implement of husbandry (IoH) from your farming operation?			
A) Less than a mile	0	0	
B) Between one mile and two miles	1	3	
C) Between two miles and three miles	6	16	
D) Greater than five miles	29	81	
Total	36	100	
3. How many municipalities do you have to travel through on the roadway with your tractor or other implement of husbandry (IoH) to reach your furthest farming operation?			
A) One	8	24	
B) Two	5	14	
C) Three	6	18	
D) Four or more	15	44	
Total	34	100	
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 15 feet in width?			
A) Yes	32	89	
B) No	4	11	
Total	36	100	
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 16 feet	2	6	
B) 17 feet	5	16	
C) 18 feet	9	28	
D) Greater than 19 feet	16	50	
Total	32	100	
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 17 feet in width?			
A) Yes	24	67	
B) No	12	33	
Total	36	100	
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry (IoH)?			
A) 18 feet	11	46	
B) Greater than 19 feet	13	54	
Total	24	100	
8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?			
A) Yes	16	44	
B) No	20	56	
Total	36	100	
9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry (IoH)?			
A) 14 feet	3	19	
B) 15 feet	5	31	
C) 16 feet	6	38	
D) Greater than 17 feet	2	12	
Total	16	100	

10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?		
A) Yes	10	28
B) No	26	72
Total	36	100
11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry (loH)?		
A) 60 feet to 65 feet	2	20
B) 65 feet to 70 feet	2	20
C) 70 feet to 75 feet	3	30
D) Greater than 75 feet	3	30
Total	10	100
12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations and used principally off the highway?		
A) Yes	17	47
B) No	19	53
Total	36	100
13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry (loH) that you use on the road?		
A) Yes	18	50
B) No	18	50
Total	36	100
14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	13	36
B) No	23	64
Total	36	100
15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planning equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 92,000 lbs.?		
A) Yes	22	61
B) No	14	39
Total	36	100
16. Per the loH Phase II Report Recommendations, written authorization must be obtained if an implement of husbandry (tractor, combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet/6 inches in height, 60 feet in length (single loH)/100 feet in length (combination of two loH)/70 feet in length (combinations of three loH) and/or exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many pieces of your equipment will require written authority to operate on the roadway?		
A) Zero	3	8
B) One to Three	17	49
C) Four to Five	3	8
D) More than Five	12	35
Total	35	100
17. Would a requirement for the loH driver to hold a valid WI driver's license and be a minimum of 18 years old when operating loH that is greater than 15 feet in width and/or requires a written authorization create problems for your operation?		
A) Yes, but manageable	14	41
B) Yes, with significant impact	12	35
C) No	8	24
Total	34	100
LOCAL OFFICIALS SECTION:		
Total:	15	
1. How do you describe yourself? (Please circle the one option that best describes you)		
A) Non-elected or Elected Local Government Official	12	80
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	3	20
Total	15	100

2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Yes	1	9
B) No	10	91
Total	11	100
3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)		
A) Zero (0)	11	92
B) One to Five (1 to 5)	0	0
C) Five to Ten (5 to 10)	0	0
D) Ten or Greater (10+)	1	8
Total	12	100
4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your staff be able to issue written authorization (permits) in a timely manner?		
A) Yes	7	58
B) No	5	42
Total	12	100

Comments (Farmer/Custom Operator)

- 1) Those that complain forget everyone has to eat. Maybe those that drive and bicycles need a question farmers papers to fill out the courteous of road when they get there drivers license.
- 2) Very good presentation in Stratford. I am a dairy farmer and appreciate the effort being made to let us use the equipment we invested in presently and the heads up on the direction we need to take for the future.
- 3) We understand the difficulty of your task and applaud the efforts. Our concern would be if you want farmers to utilize hoses and pumps to move manure that the townships and counties need to have the authority to make the culverts available for farmers. Many homeowners in rural settings do not want to allow a hose across their property. This makes pumping manure very difficult.
- 4) The max. allowed per axle weight will (is) way to low for our large farm equipment. If we are going to push for drag lines to pump manure we need help financially by loans and grants. - Very expensive since I own tankers that are now obsolete due to the weight per axle. So little resale value. Putting farmers in 40' to 50' tankers is a very high risk.
- 5) Is there any consideration for tractors with 2 axles with duels with larger floatation tires to raise the acceptable weight limitations?
- 6) Everyone in the state of Wisconsin needs to use more common sense, including farmers. But let's not slap the hands of the people who feed us.
- 7) My kids are certified thru safety program.
- 8) Semi tankers for transfer irrigation need to be allowed to be 9 feet wide to allow for our tubes to get away from our fenders and wheels so we can cleanly unload from the side of road without crushing shoulders.
- 9) I am glad to see there is work being done with Iowa. With everyone working together I think we all can come to agreement. Thank you.
- 10) I really do not see what good it would be to have all these permits. We can not change any of machine sizes or will any manufacturers. They are needed to get these jobs done in a timely fashion to feed the world. People driving rural area will need to slow down and have better driver education classes.
- 11) Farmers already pay for the roads they travel on through tax dollars. Minimal accidents occur with farm equipment now. Amish buggies/vehicles are involved in more. More revenue could be generated through toll roads on Interstates in Wisconsin. Anytime there is a permit a cost incurs.
- 12) I believe that any permitting should be handled by the state, so that there are no inconsistencies created by

individual town boards.

13) Do not implement more rules and regulations. Current rules and regulations are just fine. Don't get involved in width and length of IoH.

14) Amish should be required to have license plate and lighting. Horse shoes, buggies, and spoke wheels tear-up roads too. Lower the age requirement to 16 or younger if have safety courses. Weight issue more important than width. People are in a hurry. Farmers usually don't cause accidents.

15) I understand the concern for our roadways. But putting laws in place for all farm equipment and enforcing them will have a large impact on farming. I run 7,300 gallon Houle tankers and if I need to buy smaller tankers only means more road trips up and down and more wear and tear on the roads.

Total 15 comment from 36 surveys.

Comments (Local Officials)

1) In Clark County we have very lax enforcement of weight laws and local officials are very limited on our ability to enforce them.

2) Judging by the meeting (in Stratford), many of the farmers are running illegally and want to continue doing so. In the DOT's case I think this will prove to be "no good deed goes unpunished.") By shedding the light on this issue, I believe the farmers and maintaining authorities will be more at odds then ever before. In most cases it has been a don't ask, don't tell relationship. I do not agree with this, but I think it worked for the most part.

3) We have all class "B" roads year round, no exceptions. It's been saving money on road repair.

4) Will oversize permits still be available for motor carriers? Will they even be necessary?

5) The towns and counties need this to help us implement and enforce some restrictions and permits to save our roads.

6) I have concern the 15% rule begins the day I take down my spring postings down. I may be forced to keep up my spring postings longer, thus hurting other commerce. Consider having this law take place 2 weeks after spring postings are removed.

7) Our town does not have enforcement personnel.

8) I feel that much of this study is dealing with weight and height. I feel that this is important, but also feel that safety lighting should be looked into and proposed. Much of equipment on the road only has a "SMV" and no lighting.

Total 8 comments from 15 surveys.

Implements of Husbandry - Su

Last Updated: 09/11/2013

To

Confidence Level: 99% - Confidence Interval: +/- 7% - Population: 76,800 - Sample: 338

FARMER/CUSTOM OPERATOR SECTION		Total: 364
		Overall %
1. How do you describe yourself? (Please check the one option that describes you)		
A) Farmer		68
B) Custom Operator		4
C) Both a Farmer & Custom Operator		28
	<i>Response Rate</i>	98
2. What is the furthest distance (approximation) you travel on the roadway with your tractor or other (IoH) from your farming operation?		
A) Less than a mile		4
B) Between one mile and two miles		8
C) Between two miles and three miles		15
D) Greater than five miles		73
	<i>Response Rate</i>	99
3. How many municipalities do you have to travel through on the roadway with your tractor or other (IoH) to reach your furthest farming operation?		
A) One		25
B) Two		20
C) Three		15
D) Four or more		40
	<i>Response Rate</i>	96
4. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage that when in transport on the road exceeds 15 feet in width?		
A) Yes		85
B) No		15
	<i>Response Rate</i>	99
5. If you answered "Yes" to question four, what is the maximum width of your largest implement of husbandry?		
A) 16 feet		6
B) 17 feet		14
C) 18 feet		30
D) Greater than 19 feet		50
	<i>Response Rate</i>	84
6. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage that when in transport on the road exceeds 17 feet in width?		
A) Yes		70
B) No		30
	<i>Response Rate</i>	98
7. If you answered "Yes" to question six, what is the maximum width of your largest implement of husbandry?		
A) 18 feet		40
B) Greater than 19 feet		60
	<i>Response Rate</i>	68

8. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage equipment, etc.) that when in transport on the road exceeds 13 feet/6 inches in height?

A) Yes	53
B) No	47
Response Rate	99

9. If you answered "Yes" to question eight, what is the maximum height of your largest implement of husbandry?

A) 14 feet	30
B) 15 feet	34
C) 16 feet	20
D) Greater than 17 feet	16
Response Rate	53

10. Do you own any implements of husbandry (tractor, combine, forage harvester, manure tank, tillage equipment, etc.) greater than 60 feet in length (single vehicle/equipment length)?

A) Yes	31
B) No	69
Response Rate	98

11. If you answered "Yes" to question ten, what is the maximum length of your largest implement of husbandry?

A) 60 feet to 65 feet	23
B) 65 feet to 70 feet	32
C) 70 feet to 75 feet	20
D) Greater than 75 feet	25
Response Rate	31

12. Do you operate any commercial motor vehicles designed and used exclusively for farming operations on the highway?

A) Yes	43
B) No	57
Response Rate	97

13. Do you know the individual axle weight and gross vehicle weight of your largest implement of husbandry when on the road?

A) Yes	55
B) No	45
Response Rate	98

14. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage equipment, etc.) UNLOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 26,000 lbs.?

A) Yes	33
B) No	67
Response Rate	94

15. Do you own or operate any implement of husbandry (tractor, combine, forage harvester, manure tank, tillage equipment, etc.) LOADED that exceeds 23,000 lbs. on a single axle or has a gross vehicle weight greater than 26,000 lbs.?

A) Yes	46
B) No	54
Response Rate	92

16. Per the IoH Phase II Report Recommendations, written authorization must be obtained if an implement (combine, forage harvester, manure tank, tillage/planting equipment, etc.) exceeds 17 feet in width, 13 feet in length (single IoH)/100 feet in length (combination of two IoH)/70 feet in length (combinations exceeds 23,000 lbs. on a single axle or is in excess of a gross vehicle weight of 92,000 lbs. How many permits will require written authority to operate on the roadway?

A) Zero	24
B) One to Three	34
C) Four to Five	15
D) More than Five	27
<i>Response Rate</i>	97

17. Would a requirement for the IoH driver to hold a valid WI driver's license and be a minimum of 18 years old and/or requires a written authorization create problems for you?

A) Yes, but manageable	35
B) Yes, with significant impact	33
C) No	32
<i>Response Rate</i>	94

LOCAL OFFICIALS SECTION:

Total: 168

Overall %

1. How do you describe yourself? (Please circle the one option that best describes you)

A) Non-elected or Elected Local Government Official	82
B) Other (Citizen-non-farmer/custom operator, Law Enforcement Personnel, etc.)	18
<i>Response Rate</i>	96

2. For Local Officials: Do you currently issue written authorization (permits) for oversize or overweight vehicles?

A) Yes	18
B) No	82
<i>Response Rate</i>	87

3. For Local Officials: On average how many written authorizations (permits) do you issue on an annual basis for oversize or overweight farm machinery? (Both private and for hire entities)

A) Zero (0)	78
B) One to Five (1 to 5)	10
C) Five to Ten (5 to 10)	7
D) Ten or Greater (10+)	5
<i>Response Rate</i>	80

4. For Local Officials: If written authorization (permits) are authorized on an annual basis, will you or your agency issue written authorization (permits) in a timely manner?

A) Yes	72
B) No	28
<i>Response Rate</i>	74

Survey Results (One-Page-Overview)

Total Surveys: 532

Total Town Hall Attendees: 1,205

200	300	120	300	155	120		
Madison %	Stratford %	Cashton %	Green Bay %	Chippewa Falls %	Belmont %	Online %	Mail %
61	71	57	66	67	71	69	75
1	0	8	2	4	5	5	11
38	29	35	32	29	24	26	14
100	100	100	100	100	100	88	100
implement of husbandry							
0	8	4	0	2	10	8	0
4	18	13	7	8	6	6	3
10	16	22	16	17	13	12	16
86	58	61	77	73	71	73	81
100	100	100	100	98	100	100	100
implement of husbandry							
13	38	35	20	17	32	27	24
20	22	17	18	38	10	14	14
8	11	13	22	17	12	23	18
59	29	35	40	28	46	36	44
96	97	100	98	96	94	92	94
/planting equipment, etc.)							
94	68	74	95	86	82	79	89
6	32	26	5	14	18	21	11
100	100	100	100	100	98	100	100
usbandry (IoH)?							
12	4	17	6	2	4	5	6
4	35	17	15	5	22	11	16
29	15	42	19	36	43	24	28
55	46	24	60	57	31	61	50
96	68	74	93	86	81	79	89
/planting equipment, etc.)							
84	42	50	82	78	65	67	67
16	58	50	18	22	35	33	33
96	100	96	100	100	95	100	100
usbandry (IoH)?							
43	25	73	38	29	62	25	46
57	75	27	62	71	38	75	54
82	42	48	80	78	62	67	75

/planting equipment, etc.)

64	39	48	63	55	45	55	44
36	61	52	37	45	55	45	56
98	100	100	100	100	98	99	100

husbandry (IoH)?

26	14	28	41	32	25	46	19
38	33	36	32	18	46	27	31
29	20	0	15	25	18	12	38
10	33	36	12	25	11	15	12
67	39	48	61	57	44	54	44

/planting equipment, etc.)

37	21	18	34	44	32	23	28
63	79	82	66	56	68	77	72
96	100	96	96	98	100	100	100

husbandry (IoH)?

33	25	20	29	13	19	27	20
28	25	40	53	41	15	27	20
22	25	20	12	10	33	27	30
17	25	20	6	36	33	18	30
35	21	22	30	45	33	23	28

ons and used principally off

20	38	48	42	63	37	53	47
80	62	52	58	37	63	47	53
96	97	100	93	98	98	99	100

bandry (IoH) that you use

54	53	50	45	73	52	60	50
46	47	50	55	27	48	40	50
98	100	96	100	100	97	99	100

tank, tillage/planting
reater than 92,000 lbs.?

39	26	30	29	39	23	42	36
61	74	70	71	61	77	58	64
96	100	100	98	100	95	69	100

tank, tillage/planning
er than 92,000 lbs.?

61	31	23	53	42	39	49	61
39	69	77	47	58	61	51	39
90	95	96	100	98	89	73	100

ment of husbandry (tractor,
 3 feet/6 inches in height, 60
 of three loH) and/or
 pieces of your equipment

13	54	24	18	26	25	23	8
31	36	43	42	26	32	27	49
25	5	14	18	18	12	17	8
31	5	19	22	30	31	33	35
100	97	91	98	94	94	100	97

years old when operating
 our operation?

36	23	42	36	52	20	29	41
42	34	16	36	16	47	29	35
22	43	42	28	32	33	42	24
98	92	83	98	90	87	100	94

Madison % Stratford % Cashton % Green Bay % Chippewa Falls % Belmont % Online % Mail %

77	100	50	85	92	81	47	80
23	0	50	15	8	19	53	20
100	96	100	87	97	100	83	100

at farm machinery? (Both

0	45	33	8	14	17	6	9
100	55	67	92	86	83	94	91
85	100	50	87	95	78	100	73

al basis for oversize or

100	52	67	92	78	79	92	92
0	16	33	8	13	10	8	0
0	24	0	0	9	4	0	0
0	8	0	0	0	7	0	8
69	93	50	87	86	78	67	80

your staff be able to issue

71	83	67	50	88	63	64	58
29	17	33	50	12	37	36	42
54	85	50	80	86	65	61	80

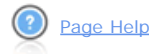
Results Text

PRINT

RESULTS OVERVIEW

Results Text

This page shows the results text of the question item that you selected.



Manage Survey Folders

Create New Survey

Implements of Husbandry (IoH) Survey

Respondents:319

Status:Closed

Launched Date:08/14/2013

Closed Date:09/10/2013

21. Please indicate if you have any additional comments:

Full Response

1.

my corn planter is 24 feet wide there is no way to fold it go after the manufacture it is only 2 years old. the hay cuter are 16 feet wide and that is probably the average with 16 feet is probably 18 feet over all you are going to put us all in the courts system. drop the town road speed to 30 mile a hour. there is to much unsafe passing.

view
2.

I think this recommendation is ridiculous. What I feel that you all fail to remember, is that these people are using these pieces of machinery to FEED YOU. Agriculture has been forced to adapt to the highest technology because the resources continue to become more and more limited each year. When you build neighborhoods and shopping malls, those thousands of acres are no longer able to be used to produce food... But the population isn't decreasing. And the more you industrialize the world, the farther apart the fields become from eachother. We are not winning the battle to preserve farmland, but we are using all of our knowledge to continue to provide food and products for the ones taking it away. You are now just putting one more roadblock to restrict the production of food and products that you use daily. I think there are other areas that need to be focused on rather spending our tax dollars on an issue that will not solve anything. You are going to perform road construction whether we take large machines off the roadways or not.

view
3.

I have written e-mails to this study group and did not receive any reply or acknowledgement.

view
4.

We would be able to issue permits in a timely manner, but we have no means to enforce these proposed regulations. Many area farmers have children under the age of 18 who are competent to operate farm vehicles and need to be on the road to get from one farm field to another. Our son is older than 18 now, but we relied on him heavily when he was under age 18 for fieldwork which required traveling on county and town roads.

view
5.

The very large size of IOH & tractors now sharing public roadways concerns me greatly. I'm glad the problem is being discussed and I look forward to a resolution that will protect the safety of all concerned. The time is long overdue for this discussion. I realize there are some that will argue for no limitations. That is a selfish position that shows a disregard for the safety of their neighbors. We all must measure our needs against those of our neighbors and seek a reasonable resolution. Thank you for the opportunity to comment. Take Care

view
6.

This possible DOT authorization permitting the heavier limits of this HEAVY mammoth equipment will definitely be breaking and busting up the town roads faster than we already CANNOT keep up with. I do not support this weight increase & there is NOT enough money to repair and maintain the towns roads at this current time already !!!
Displeased, RICK SCHMIDT, Town of Dekorra Chairman & Road Supervisor Columbia County

view
7.

This would be a very extreme inconvenience to our farming operation.

view
8.

This if it goes forward will severely limit the future of Agriculture in the state of Wisconsin. You are putting all the blame on the farmers/operators and the machines but we are forced to use the antiquated roads systems that are poorly maintained and poorly funded by this state government.
You are telling me that my ability to operate is now up to a political figure and as things have been going in this state may not allow me to operate because of my political views differing from there's and they will basically limit or stop my operation. If you don't believe this can happen look at our state government now. Our operation try's to control travel traffic with routing and controlling weight but these commodity's we work with are not nice square boxes that have a given weight for their size so many times the axle or bridge weight cannot be controlled unless we or manufacture's give us more axles and a weight limit like Michigan. The roads we operate on have not change much since they were built. Poor drainage of them and poor location and design because most rural roads not designated highways are little more than buggy trains covered in asphalt.
Nothing with this will gives attention to the driving public that forces our machines off the paved roads and

view

	<p>into the ditches and shoulders were road damage and severe accidents and wreckage can and do occur. The potential of laws like this can be a reason why operations such as ours will relocate to states like Kansas, Nebraska, Etc that are not trying to limit or destroy an industry.</p> <p>Attended as a concerned citizen. Drive bus and operate a repair garage which over half of my business is farm equipment. Spend plenty of time sharing the road with ag equipment. My prior background is in truck transportation and repair. I have no issue with regulations which are in the public interest. We all have to abide for the common good. Frankly I was unaware of what ag equipment regulations there were. Was very informative. I came away with the impression that all involved in the process put good faith in doing a comprehensive job in coming up with solutions for such varied interests. Was also pleased to hear that research involved other states organizations. YES we need some standardization in regulations. It is too bad that many operators were sold equipment that is not always suitable for the situations that they encounter.</p>	
9.	<p>Is also unfortunate that some government entities can be closed minded to the special needs of some of the local businesses.</p> <p>So many of our solutions can come from education, information and co-operation.</p> <p>Thanks for a open and civil presentation. I look forward to following up on and staying informed.</p> <p>John T. Beyerl Hiway C Garage,LLC M112 County Road C Marshfield, WI 54449 Ph: 715.383.0381</p>	view
10.	<p>Some farmers have spent huge amounts of money on equipment, many built in Wisconsin and now the DOT wants to start making us get permits for equipment that moves down the road daily. I think we in agriculture are at a point that we do need to realize that our equipment is very large and does do damage to the roads that will need repair. I think instead of permits there needs to be talk of fees on purchases of certain large equipment that damage the roads the most. Making local municipalities that are already short handed do permits is not the answer.</p>	view
11.	<p>we already have laws now this is not needed</p>	view
12.	<p>allowing unregulated use of very heavy farm equipment on town roads which are not generally designed for these loads will result in premature deterioration and very high road repair and replacement costs to towns, who cannot even afford to keep in proper repair their roads under current conditions. The road edge suffers the most damage, and wide ag vehicles are most likely to load that part of the road.</p>	view
13.	<p>The main problem is you need money we have no money-Doyle stole money!!!!local townships don't want your problems you don't want to raise your food your self so call ex governor Doyle and have him give the money he stole from the road fund-build roads right the first time and help the farmer-not make more rules that are eventually are going to go to far and make real criminals for all officials to deal with. To be honest with you the government officials that are out here making rules don't follow them anyway or are not in because they work 2 days a week as it stands. So you might want to stop with all this ridiculous rules</p>	view
14.	<p>Quit wasting taxpayer money on this crap and just fix the roads!!!</p>	view
15.	<p>being unable to haul full loads of forage or manure would be extremely expensive and time consuming, it would require many more trips and that would be more damaging to the roads especially in the hills.</p>	view
16.	<p>Equipment should be "grandfathered" per manufactured date.</p>	view
17.	<p>Having a drivers license doesn't make one capable of driving farm equipment.</p>	view
18.	<p>I am not a farmer , but wonder how this is different than the sand trucks that continuously run the roads as well as the train operated for the sand plant that blocks the roadway for 15 minutes or more.? What stipulations does the sand plant have on the wear and tear of the roads they travel and the amount of time drivers are forced to wait for the train on highway "s" in Chippewa County? If you are going to set limitations and make regulations for our community farmers, then take a closer look at the sand plant who are not local citizens and he impact the trucks and train makes on Chippewa county citizens all day long everyday.</p>	view
19.	<p>I am greatly disappointed that the study did not address the quality of the roads being used, the vast majority of our town ship roads are not able to stand the strain of heavy loads, If an individual wanted to use an Abrams Tank for a tow vehicle and 3 60,000 pound manure tanks, the town ship would not care IF the road would hold the weight, DOT needs to ADDRESSES THE ROAD CAPABILITIES BEFORE THE LOAD. The state, the hauler, or land owner need to provide the funding to improve or redevelop the roads to meet it's needs, not the needs of the town ship. rather then the average home owner in the town ship having to pay for road improvements that they do not cause damage to.</p>	view
20.	<p>Thanks you,</p> <p>These rules you guys want to put into effect is just another way for the politics to make a dollar. Farmers shouldn't have to worry about getting a permit to bale hay or combine there corn and beans. Farmer don't have the time in the fall or in the spring to be dicking around trying to get a permit so they can put crops in the ground. They don't have the time to do this. Also if you make it more difficult to get crops off the field HOW WILL YOU EAT?? Someone has to feed America. It sure isn't people that sit in a flipping office all day. Most farmers have a half a day in by the time most people get to work at 8 o'clock in the morning!</p>	view

21.	I am a salesperson for a John Deere dealer. Delivering equipment to customers is going to be a hassle I can see.	view
22.	The agriculture industry that has a 60 billion dollar impact of our Wisconsin pocket book and employs the most people either directly or indirectly. The government has no problems throwing millions of dollars at smaller industries without as much economic impact. Lets just invest in our roads that were built in the 40's and 50's so ag can do it's job.	view
23.	The written authorization from individual municipalities will create an unmanageable wall! Many of the town officials are small farmers with time to sit on a board. They usually have a negative view on someone larger than them self,so they will do whatever they can to make life hard on us.If we need to have rules to live by,at least streamline them at the top so we don't have to deal with the local government!!	view
24.	As a 30+ year veteran of law enforcement it has been obvious that IOH have gotten a free pass and it is not justified that they not be held to the same standards as other operations. It has only continued do to political considerations, not wise use of our DOT resources.	view
25.	We pay high taxes so those tax dollars should get used to maintain those roads we farmers have to drive on every day. Widen the roads and make road repairs. I drive school bus. There are roads I drive on that should be wider cuz what if I meet a careless driver on the road. I do not have much room to get over to keep those kids out of harms way. WIDEN THE ROADS. And do not limit a farmers time they can use the roads. And what farmer has time to run to DMV office every time he takes big equipment on the road. Very few. My husband works 4 AM to about 8-9PM. Sometimes longer during harvest. As far as I am concerned, farmers pay big taxes so they own the road. Other drivers need to respect the farmers. They work hard to feed the people. Another problem my husband has is impatient drivers passing his big equipment when he is slowing down to make a left turn. He signals plus has SMV signs. People are stupid and impatient. RESPECT THE FARMERS.	view
26.	These vehicles need to have drivers with CDL licenses, the public should not be put at risk of injury just to get a farmer (who already pays no taxes and has no regulation, like OSHA to oversee operations) a break. They do bring part of the economy to Wisconsin, but so do the rest of us. Do not endanger public safety! On behalf of the members of the Farm Equipment Manufacturers Association, I am writing to convey our concerns with the Wisconsin Department of Transportation's Implements of Husbandry Study Group, with particular reference to the Group's Phase II Report, which appears to be a significant departure from the Study's original purpose. The Farm Equipment Manufacturers Association represents over 330 manufacturers of specialized farm equipment, in addition to over 360 firms supplying goods, services, and marketing to our member companies. Our manufacturers are not giant, multi-national tractor manufacturers, but are mainly privately held, small, family run businesses; 32 of which are located in the state of Wisconsin. After reviewing the Study's original purpose — to research alternatives limiting the damage to rural roads from overloaded trucks and trailers carrying animal waste, largely occurring during seasons when the roadbed is at its weakest level — we now find it difficult to understand how the expanded Phase II portion of the study, which includes nearly all categories of agricultural equipment, specifically relates to the original issue being researched. That said, if Phase II is allowed to progress as it currently stands, we believe the burden will be unfairly placed on Wisconsin farmers, ranchers, dairymen, equipment dealers, and equipment manufacturers. To my knowledge, not a single representative from our Association, or any of our Wisconsin members, were asked to actively participate in this impactful Study. After reading Phase II of the report, I believe the lack of input from small manufacturers and their dealers, has resulted in a very flawed proposal. If the result of the Study limits our members' ability to design, manufacture and transport modern and efficient equipment from their manufacturing facilities to Wisconsin dealerships, and the dealers' ability to deliver new equipment to Wisconsin farmers, everyone, including the consumer, is harmed.	view
27.	The Group's rapid change of focus and lack of transparency when widening its scope, greatly limited our ability to not only inform our members about this topic, but more importantly, it did not allow us to seek feedback from our members, which in turn could have provided useful information for the Study analysis. We urge you and the Wisconsin Department of Transportation to carefully consider the negative effect new regulations resulting from the flawed findings of Phase II will have on all parties involved before making any final recommendations to your state legislature. In moving forward, we remain eager to offer assistance in finding solutions to these important issues. Best Regards, Vernon F. Schmidt Executive Vice President Farm Equipment Manufacturers Association 1000 Executive Parkway Suite 100 St. Louis, MO 63141-6369 314-878-2304	view

28.	<p>I am a farmer and town board chairman. I feel it is necessary to do more studies on the effects of large manure tankers and in the meantime to allow them on town roads with still possible limits on their use of town bridges, as long as the farmers are informed that they may be responsible for damages. The farmers do not need a law enforcement officer chasing them down town, county or state roads when they have a nutrient management plan that requires them to apply manure on fields that are away from their farmstead.</p> <p>1) If the additional 15% weight is granted for IOH's, please keep in mind that there are NUMEROUS farms and custom operations that use semi trucks for hauling manure and forage from field to farm and vise versa. In many cases, these vehicles are required to be licensed and technically not IOH's....but it is imperative that these 5 axle semi's hauling forage and manure be granted the additional 15% allowance. I would say that well over 50% of all the manure and forage that is moved between field and farm in Wisconsin is handled by 5 axle semis....licensed or not.</p> <p>2) I realize the Study Group did not consider this issue but it is important to allow Custom Operators the same considerations as "farmers" when it comes to licensing, CDL requirements, taxable fuel, etc. As it stands now, Custom Operators are treated more like over-the-road trucking companies than farmers. Yet drivers of "farmer" semi trucks are essentially treated the same as drivers of most Implements of Husbandry. This inequity in the rules provides a competitive disadvantage to the custom operator and his/her farmer customers, while giving an advantage to the larger farms whose operation allows the purchase of semi trucks. Essentially the farms that purchase and operate their own trucks can operate them cheaper (no CDL requirements, no drug testing, no road tax, no licensing, etc.) than the farm whose operation either chooses or is required to hire a custom operator. In addition, there is a very "grey" area when a custom operator also operates a farm. Many of those "custom operators" that work for hire just simply don't follow the above mentioned requirements because they also operate their own farming land. In conclusion, Custom Operators and "Farmers" should be treated the same when they are doing the EXACT same work. The "farmer" with his own trucks is hauling his own silage and manure, while the custom operator is hauling silage and manure FOR a "farmer".</p>	<div>view</div>
29.	<p>Whatever laws/rules you make, be sure they apply to everyone, including townships, county, state, and federal employees and vehicles. (including military, and snowplows, trucks, graders, load equipment.....)</p>	<div>view</div>
30.	<p>Be sure to advertise that people can not complain about the price of food!</p>	
31.	<p>I am glad to see some help with this. As chairperson I have a hard time with grain truck, manure haulers, and other commercial truck. A big problem is tractors pulling equipment enter and exit fields where ever it's convenient. I would like to see the farmer post roads on days they are traveling on it. We have some dangers corners etc., I am just waiting for a bad accident. We have trouble using the county/state law enforcement officers responding to request. Thanks dorie</p>	<div>view</div>



Implements of Husbandry - Presentation Survey Results (One-Page-Overview)

Last Updated: 09/11/2013

Confidence Level: 99% - Confidence Interval: +/- 5% - Population: 76,800 - Sample: 660

Total Presentation Surveys: 806

Total Town Hall Attendees: 1,205

IoH Presentation Questions		Total Attendees:	200	300	120	300	155	120
		Total Participants:	112	169	100	189	118	118
		Overall %	Madison %	Stratford %	Cashton %	Green Bay %	Chippewa Falls %	Belmont %
1. How do you describe yourself? (Please check the one option that describes you)								
1) Farmer		45	55	43	43	42	35	54
2) Highway Superintendent or Commissioner/Public Works		3	2	6	2	4	2	3
3) Custom Operator		9	5	6	13	15	7	4
4) Equipment Dealer		7	9	5	13	3	9	8
5) Elected Official		25	15	27	17	30	36	19
6) Citizen		4	2	5	4	2	4	5
7) Agri-Business		7	12	8	8	4	7	7
	Response Rate	80	79	83	63	85	83	82
2. What area of the state are you from?								
1) Northwest		26	N/A	24	11	2	98	0
2) North Central		27	N/A	75	7	20	1	1
3) Northeast		19	N/A	0	2	76	0	0
4) Southeast		26	N/A	0	71	2	0	96
5) Southwest		2	N/A	1	9	0	1	3
	Response Rate	65	N/A	86	56	69	73	84
3. What is the maximum width of a farm tractor operating on a non-Interstate highway?								
1) No Limit		36	40	27	40	38	28	49
2) 8 Feet 6 Inches		10	6	16	8	7	19	4
3) 12 Feet		39	35	46	34	35	44	35
4) 15 Feet		15	19	11	18	20	9	12
	Response Rate	92	96	95	86	88	95	96
4. What is the maximum per axle weight limit for IoH?								
1) 10,000 lbs.		8	4	8	11	8	14	5
2) 20,000 lbs.		57	65	71	59	47	58	43
3) 30,000 lbs.		13	14	11	15	9	15	18
4) No Limit		22	17	10	15	36	13	34
	Response Rate	91	98	95	81	86	95	94
5. What is the gross vehicle limit for IoH?								
1) 25,000 lbs.		1	0	1	N/A	1	1	0
2) 50,000 lbs.		4	9	3	N/A	3	3	4
3) 80,000 lbs.		80	74	89	N/A	78	85	71
4) 100,000 lbs.		7	8	3	N/A	8	8	9
5) No Limit		8	9	4	N/A	10	3	16
	Response Rate	83	96	97	N/A	89	96	97
6. Do you know the gross vehicle weight of the largest piece of equipment that you use on the road?								
A) Yes		49	55	48	48	45	57	46
B) No		51	45	52	52	55	43	54
	Response Rate	90	97	96	75	87	91	95
7. How many pieces of your equipment exceed the proposed size and weight limits?								
1) Zero (0)		27	18	30	42	24	33	22
2) One to Three (1 to 3)		33	36	37	30	36	19	34
3) Four to Five (4 to 5)		15	21	14	11	18	13	11
4) More than Five (5+)		25	25	19	17	22	35	33
	Response Rate	78	88	80	64	72	76	86

Appendix B: Letter and Email Feedback

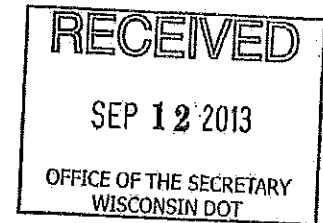


FEMA130453
DTS D

Our Members Bring Choice, Value & Innovation To Agriculture

September 6, 2013

The Honorable Mark Gottlieb
Wisconsin Department of Transportation
Hill Farms State Transportation Building
4802 Sheboygan Avenue
P.O. Box 7999
Madison, Wisconsin 53707-7999



Dear Secretary Gottlieb:

On behalf of the members of the Farm Equipment Manufacturers Association, I am writing to convey our concerns with the Wisconsin Department of Transportation's Implements of Husbandry Study Group, with particular reference to the Group's Phase II Report, which appears to be a significant departure from the Study's original purpose.

The Farm Equipment Manufacturers Association represents over 330 manufacturers of specialized farm equipment, in addition to over 360 firms supplying goods, services, and marketing to our member companies. Our manufacturers are not giant, multi-national tractor manufacturers, but are mainly privately held, small, family run businesses; 32 of which are located in the state of Wisconsin.

After reviewing the Study's original purpose — to research alternatives limiting the damage to rural roads from overloaded trucks and trailers carrying animal waste, largely occurring during seasons when the roadbed is at its weakest level — we now find it difficult to understand how the expanded Phase II portion of the study, which includes nearly all categories of agricultural equipment, specifically relates to the original issue being researched. That said, if Phase II is allowed to progress as it currently stands, we believe the burden will be unfairly placed on Wisconsin farmers, ranchers, dairymen, equipment dealers, and equipment manufacturers.

To my knowledge, not a single representative from our Association, or any of our Wisconsin members, were asked to actively participate in this impactful Study. After reading Phase II of the report, I believe the lack of input from small manufacturers and their dealers, has resulted in a very flawed proposal. If the result of the Study limits our members' ability to design, manufacture and transport modern and efficient equipment from their manufacturing facilities to Wisconsin dealerships, and the dealers' ability to deliver new equipment to Wisconsin farmers, everyone, including the consumer, is harmed.

The Group's rapid change of focus and lack of transparency when widening its scope, greatly limited our ability to not only inform our members about this topic, but more importantly, it did not allow us to seek feedback from our members, which in turn could have provided useful information for the Study analysis.

We urge you and the Wisconsin Department of Transportation to carefully consider the negative effect new regulations resulting from the flawed findings of Phase II will have on all parties involved before making any final recommendations to your state legislature. In moving forward, we remain eager to offer assistance in finding solutions to these important issues.

Best Regards,

A handwritten signature in black ink, appearing to read 'V. Schmidt'.
Vernon F. Schmidt
Executive Vice President



P.O. BOX 2500 • BLOOMINGTON, IL 61702-2500 • (309) 557-6000 • <http://www.growmark.com>

September 12, 2013

Mr. Rory Rhinesmith, Deputy Administrator
Division of Transportation System Development
Wisconsin Department of Transportation
PO Box 7910
Madison, WI 53707-7910

Re: Comments on Implements of Husbandry Study Group Recommendations

Dear Mr. Rhinesmith:

I appreciate the opportunity to comment on the Implements of Husbandry Study Group's recommendations establishing limitations on the length, width, height, and weight for implements of husbandry and other best practices on behalf of GROWMARK, Inc. Like the rest of the agriculture industry, we want a roadway infrastructure that is safe, sound, and serves the needs of the variety of vehicles that travel the state of Wisconsin.

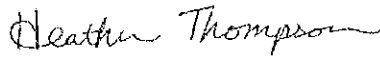
The definition of an "Implement of Husbandry" should be improved with more clear and specific parameters. Using travel time declarations for on-road and in-field use to determine an implement of husbandry is not necessary. The distance between fields is highly variable and is not relevant for determining an implement of husbandry. Farming requires the ability to move from field to field. The focus of the definition should be on an implement of husbandry's use. Implements of Husbandry are used primarily off the highway and this fact should be a guiding principle in the rules made regarding them.

Implement of Husbandry width dimensions should be increased to 12 feet. This width would match tractor width allowances and standardize the definition. Definition and operational standards are important. Multi-jurisdictional permits, oversight, or definition changes will not be productive. Agriculture works throughout the year and due to some weather-related conditions, in very short and productive timeframes. Efficient and effective regulation would be applicable in as many jurisdictions as possible for clear understanding and compliance in Wisconsin.

Implements of Husbandry weight and its configuration is a main focus for the Study Group. While it is a best practice for some Implements of Husbandry to operate empty traveling from field to field, there are instances where that may not be practical. We ask the Group to consider a "de minimus" distance be allowed to move Implements of Husbandry loaded when situations arise; i.e. situations when the distance from farm to field is very short, situations when an operator must go across the road to access a field, and situations where there is no access for tender trucks in the field.

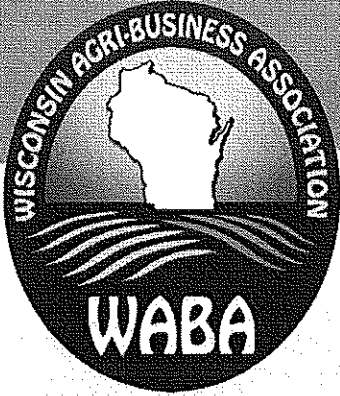
We appreciate the opportunity to comment. Any new rules considered should be phased in to allow the useful life of current equipment to expire.

Sincerely,

A handwritten signature in cursive script that reads "Heather Thompson".

Heather Thompson
Corporate and Government Relations
GROWMARK, Inc.

GROWMARK is a regional cooperative providing agriculture-related products and services, as well as grain marketing in 43 states and Ontario, Canada. GROWMARK owns the FS trademark, which is used by affiliated member cooperatives. The FS brand represents knowledgeable, experienced professionals acting with integrity and dedication to serve more than 100,000 customers. More information is available at www.growmark.com.



2801 International Lane, Suite 105
Madison, WI 53704

Phone: (608) 223-1111
Fax: (608) 223-1147

September 10, 2013

Rory Rhinesmith, Deputy Administrator
Division of Transportation System Development
Wisconsin Department of Transportation
PO Box 7910
Madison, WI 53707-7910

Dear Rory:

The Wisconsin Agri-Business Association (WABA) sincerely appreciates the opportunity to provide comments on the proposals drafted by the Implements of Husbandry Work Group, issued on July 31, 2013. The Wisconsin Agri-Business Association is a trade association representing over 320 agribusiness companies spanning the State of Wisconsin, with primary lines of business including: grain elevators, feed mills, seed technology companies and dealers, fertilizer manufacturing sales and service, farm chemical manufacturing sales and service, ethanol plants, farm and agribusiness equipment dealers, farm stores, etc... We are proud to be a significant part of the \$60 billion agriculture industry in Wisconsin.

WABA agrees that conducting a study concerning Implements of Husbandry in our state was necessary. While agricultural equipment has been growing in size and capacity for a number of years, it has clearly outpaced the state's ability to provide and maintain adequate infrastructure to support this growth in agricultural equipment. WABA applauds the efforts of the Department of Transportation and the Work Group members for the time and effort they have put into the project. If nothing else, this study and the Town Hall Meetings have already raised the awareness of that small percentage that are "bad actors", who have intentionally ignored and abused regulations. Progress is sure to come from everyone's continued efforts.

We think everyone recognizes that the size of agricultural equipment on the roads today has not been a phenomenon that simply happened over night. The growth in size and capacity of this equipment has been fifty or sixty years in the making. And therefore, to think that all interested parties can reach an acceptable solution over night is a dream that cannot realistically be achieved. Not to say that some things cannot, should not, and need not be done as soon as possible, but some pieces of the solution need ten plus years before they can realistically be achieved. Let us state an example.

Concerning weight, the results of the Implements of Husbandry Phase Two Study show that some types of terragators used by our members exceed the federal bridge formula by as much as 21% when they are empty. It also shows that they can exceed the federal bridge formula by as much as 144% when they are filled. At the time these terragators were purchased, no focus or concern of any kind was addressed about this equipment. Our members purchased the equipment, not even imagining that there would be a future concern. But now that they have paid, in some cases, as much as a half million dollars for each of these terragators (some companies have many units), it is being proposed that the heaviest of the machines should no longer be allowed to use the roadways to get to their job sites. Keeping in mind that these machines are only used seasonally, not year around, and that they may be used to apply product to as many as a dozen fields a day, having to "trailer" this equipment to transport it from job site to job site is impractical, very detrimental to the efficiency and effectiveness of the machine, and very expensive. In the very beginning, when the Implements of Husbandry Work Group began its work, the agreed outcome of the Work Group was to find an effective mix between promoting agricultural operations and protecting the infrastructure. The requirement of transporting a terragator from field to field on a trailer does not fall within that definition of an "effective mix".

What the Wisconsin Agri-Business Association would propose is to find multi-phased solutions to the issues concerning Implements of Husbandry. Some things can effectively be addressed in the short term that will take a lot of the stress off our roads, such as restricting terragators to travel on our roadways when they are loaded. For the most part, this is a workable solution to our industry. However, other solutions need to be longer term solutions that may not be fully enforceable until perhaps 2025, when existing equipment is rotated out of inventory and replaced with more "road-friendly" equipment. Because of the costs and efficiencies mentioned above, Wisconsin needs to allow all terragators on the roadways while they are empty, but restrict their road usage when they are filled.

This is just one simple example of equipment used in our industry, and an effective way of easing roadway weight concerns that is more acceptable to the industry, and yet immediately solves the most extreme road weight issues created by being loaded. There are numerous other implements and pieces of equipment that our members, as well as farmers and others, use that will need to be discussed one by one to determine what short term solutions can be made and what longer term solutions need to be plotted out over a course of years.

In addition to the issues mentioned above, WABA would also like to submit brief comments on the following:

* We propose a change to the proposed definition of Implements of Husbandry. We would propose the following change:

Implements of husbandry means a self propelled or towed vehicle manufactured, designed, or reconstructed to be used exclusively in the conduct of agricultural operations and is used primarily off the its primary purpose is for off-highway use. An "implement of husbandry" includes a farm tractor, self-propelled application-type vehicles (such as a combine), farm wagon, farm trailer, or trailer adapted to tow or pull another implement of husbandry, or any substantially similar equipment used to transport agricultural products necessary for agricultural production.

* We support changing the width envelope for IoH to 17 feet with certain safety devices (flags, flashing lights, etc...) in place. We support changing the width envelope for IoH CMVs to 12 feet (from the current recommendation of 10 feet) with the same safety devices in place. We do not support the requirement for companion vehicles to travel in front of or behind this equipment when within these width limits.

- * For fertilizer and farm chemical dealers, in-season delivery and application schedules cannot be determined in advance. Therefore, multiple jurisdictional permits or approvals are unworkable.
- * There will be cases where our members will need to run fertilizer and chemical applicators from field to field with partial loads on the equipment. It is not possible to always be completely empty when moving from field to field.
- * When weather and agronomic conditions so warrant, farm work often becomes a twenty four hour a day, seven day a week operation. Current time restrictions on agricultural equipment needs to be discussed and changed to allow agricultural businesses to do its job on a timely basis.

In closing, agriculture in the State of Wisconsin has become a major contributor to the state's economy. Efforts to implement all aspects of the IoH Phase II Report would take many of our state's advantages away from our agricultural industries and put Wisconsin farmers and agribusinesses at an economic disadvantage to our neighboring states. While some segments of the study can be addressed in the short term, many must be discussed as potential longer term solutions. Discussions need to continue in order to find this balance, and the Wisconsin Agri-Business Association commits to being a part of those discussions moving forward.

The Wisconsin Agri-Business Association appreciates the opportunity to submit our comments on the Implements of Husbandry Phase II Report.

Sincerely,

Tom Bressner
Executive Director

Please respond to: Capitol Square Office
Email: jkl@dewittross.com
Direct: 608-252-9358

September 6, 2013

Wisconsin Department of Transportation
Implements of Husbandry Study Group
IoHStudyFeedback@dot.wi.gov

VIA EMAIL ONLY

RE: Combined Trade Association Comments on Proposed Implements of Husbandry
Regulatory Changes

Dear Members of the Wisconsin DOT Implements of Husbandry Study Group:

On behalf of the members of the **Wisconsin Potato & Vegetable Growers Association**, the **Wisconsin Pork Association** and the **Wisconsin Cattlemen's Association**, I am submitting the following comments on your Study Group's (the Group's) recommended regulatory changes contained in the Phase II report.

Width and Height Do Not Cause Road Damage. A number of the recommendations in the Group's Phase II report involve the creation of restrictions on the width of Implements of Husbandry (IoH). Under current law, there are no statutory width or height limits for IoH when they are temporarily operated upon a highway. If road damage was the trigger for the group's in-depth look at recommending increased or new regulations for IoH, then why does the report recommend width and height restrictions? What public policy issue with regard to width, in particular, will this new regulation address?

As you have likely heard at the statewide Town Hall meetings, much of the farming equipment that is used for planting and harvesting crops in Wisconsin is more than 15' wide. For example, a 6-row corn planter is 17'6" wide. A typical harvester used for potatoes and vegetables is 24' wide.

We respectfully request that you remove any width restrictions on IoH as a means to address road damage. If width is a safety concern, then we suggest that you consider requiring additional safety measures for wide IoH's, such as an escort vehicle, lights or flags. But, we are opposed to the requirement that farmers seek prior written authorization from all local townships for IoH exceeds 17' wide. (See comments on local permits below.) Rather, set a

DOT Implements of Husbandry Study Group
September 6, 2013
Page 2

requirement for over-width vehicles to address safety concerns and make that requirements applicable uniformly statewide.

Local Permits are Problematic. Under the proposal, for a farmer to use machinery that exceeds the weight, height or width limitations, the farmer must ask for “prior authorization” (*i.e.*, a permit) from all local townships through which the vehicle will cross. This requirement is unrealistic and unnecessarily burdensome for farmers who operate and transport machinery across multiple townships on a daily basis and often as weather permits.

We do not believe that local permits can be issued uniformly or efficiently. We also question whether townships are prepared financially (and have available manpower) to conduct the permit review and issuance process in a timely manner. We are concerned about the appeal process for denials of local permits, as we know there will be townships that will refuse to review these applications. In summary, we oppose this provision because it is unrealistic for farmers, who are moving equipment quickly in order to plant or harvest crops, to request written permits for the movement of implements from every township in which they work on a daily basis.

We oppose this proposal and request that you eliminate the local permitting requirement. Instead, we recommend that you develop a uniform statewide system. Statewide standards will prevent patchwork local regulation of farm equipment.

Proposed Weight Restrictions Do Not Consider Frequency of Use or Alternative Road Usage. We notice that there is no distinction in the proposal for large or heavy equipment that is used or moved infrequently (*e.g.*, just a few times a year), versus overweight equipment that is used on a daily basis. Presumably, road damage from a harvester that is moved just a few days a year would not match the damage caused by a vehicle used to haul inputs on a daily basis despite the fact that their weights may be similar.

Accordingly, we recommend that you consider distinguishing between “input or crop transport equipment” and “field operation equipment.” Such a distinction could be a way that this proposal could provide allowances for equipment that is moved very infrequently on the roadways.

In addition, when we move our largest equipment, we typically use both lanes of the road, thereby spreading the weight over twice as much pavement as a CMV operated in just one lane of the highway. We believe that this practice reduces the impact on the road and options, like this, should be provided for in the proposal.

DOT Implements of Husbandry Study Group
September 6, 2013
Page 3

No Protections for Investments in Current Equipment. We are concerned that our farmers have already invested hundreds of millions of dollars in new farming equipment that these proposed regulations could prohibit. How does your proposal protect or grandfather in equipment that is already purchased or that is already being used on Wisconsin farms?

Thank you for your consideration of these comments. If you have any questions, please contact me at (608) 252-9358 or jkl@dewittross.com.

Very truly yours,

DeWitt Ross & Stevens s.c.

/s/ Jordan K. Lamb

Jordan K. Lamb

JKL:jkl

cc. Duane Maatz, Wisconsin Potato & Vegetable Growers Association
Mike Wehler, Wisconsin Pork Association
Terry Quam, Wisconsin Cattlemen's Association

Lester C

**TOWN OF CENTER
N3990 STATE ROAD 47
APPLETON WI 54913-8484**

(920) 731-7229

tnclerk@tnofcenter.com

website: www.centerwi.com

September 4, 2013

Wisconsin Department of Transportation
4802 Sheboygan Avenue Room 451
P O Box 7965
Madison WI 53707-7965

RE: DOT/DATCP Implements of Husbandry

Please be advised that the Town of Center, Outagamie County supports the proposed size and weight of implements of husbandry on highways and users of the highway.

As a township, we are responsible to protect the public investment in highways. We, as a township, are familiar with our roads and the construction of them. We are not in support of a permit system administered through the State to allow permission of heavy and over sized loads utilizing our roads. These permits should be issued by the individual municipalities where the roads are located.

If you have any questions, please do not hesitate to contact us.

Sincerely,

The Town of Center Board of Supervisors



Robert "Toby" Paltzer, Chairman

RNP:njc



1 South Pinckney Street, Suite 810, Madison, WI 53703-2869
608.258.4400 fax 608.258.4407
400 Selby Avenue, Suite Y, St. Paul, MN 55102-4520
651.228.0213 fax 651.228.1184
www.cooperativenetwork.coop

September 3, 2013

Mr. Rory Rhinesmith, Deputy Administrator
Division of Transportation System Development
Wisconsin Department of Transportation
PO Box 7910
Madison, WI 53707-7910

Re: Comments on Implements of Husbandry Study Group Recommendations

Dear Mr. Rhinesmith:

Cooperative Network appreciates the opportunity to provide comments on the Implements of Husbandry Study Group's recommendations that establish clear limitations on the length, width, height and weight for implements of husbandry and other recommended best practices. Cooperative Network is a trade association that represents the interests of more than 300 cooperative businesses headquartered in Wisconsin, including numerous agribusiness cooperatives that operate many types of implements of husbandry. Collectively, agribusiness cooperatives account for more than half of the total agribusiness volume within the state and provide numerous products and services to support tens of thousands of farmers who grow crops and raise livestock.

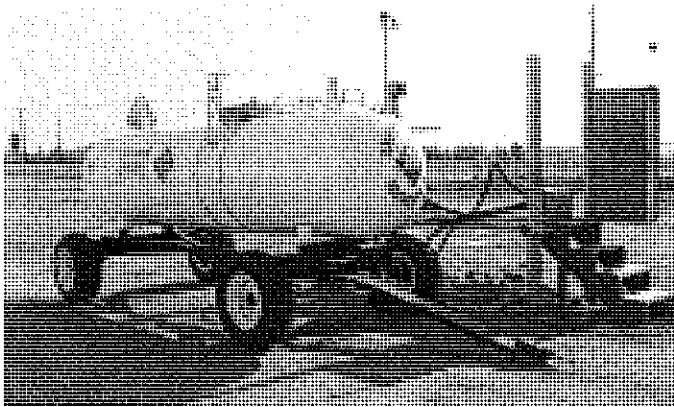
If acted on by the Legislature "as is," the Study Group's recommendations could have significant impacts on the future use of implements of husbandry, and in some cases prematurely end the use of certain types of equipment that a farmer or agribusiness may have just purchased. It is concerning that the input received from those at the town hall meetings suggests the recommendations will negatively affect the majority rather than a minority of farmers and agribusinesses. As an example, the Department of Transportation's survey of participants at the Madison meeting indicated that 81% of the individuals in attendance had at least one piece of equipment that would either be oversize or overweight based upon these recommendations. Cooperative Network believes the actual number is much greater because the weight recommendations are being presented as they would apply to Class A roads. In reality many of the town roads that farmers and agribusinesses use are Class B roads. When the weight limit is reduced to 60% of the Class A limit (see S. 348.16), Cooperative Network presumes very few pieces of equipment in the engineering matrix will be below the weight limit, even when empty. It would be useful to have a second matrix for Class B roads to provide a better understanding of how the recommendations will affect implements of husbandry operated on Class B roads.

Several of the recommendations could have a dramatic impact on the efficiency of agribusinesses.

- **Definition of an "Implement of Husbandry."** Cooperative Network supports changing the definition of an "implement of husbandry" to more clearly define these vehicles. Many times Cooperative Network or its members (and other agribusinesses) have had to seek letters from the State Patrol to clarify, for other enforcement officials, that the current use of "implements of husbandry" is not exclusive to farmers and does include certain vehicles used by agribusinesses. The proposed definition in Appendix C is a significant improvement. However, Cooperative Network suggests a revision to the definition to address uncertainty that could arise under the proposed definition related to the amount of travel time vs. time in-field. As the size of farms has gotten larger and agribusinesses have consolidated, the travel time between in-field uses of implements has increased. Further, this definition would allow an implement dealer to deliver implements of husbandry to farm locations, since the equipment they deliver rarely spends any time in the field before the title of ownership transfers.

Implement of husbandry" means a self-propelled or towed vehicle manufactured, designed, or reconstructed to be used exclusively in the conduct of agricultural operations and is used primarily off the its primary purpose is for off-highway use. An "implement of husbandry" includes a farm tractor, self-propelled application-type vehicles (such as a combine), farm wagon, farm trailer, or trailer adapted to tow or pull another implement of husbandry, or any substantially similar equipment used to transport agricultural products necessary for agricultural production.

As an example, on its appearance and its application, virtually everyone would agree that an anhydrous nurse tank (image provided) is an implement of husbandry.



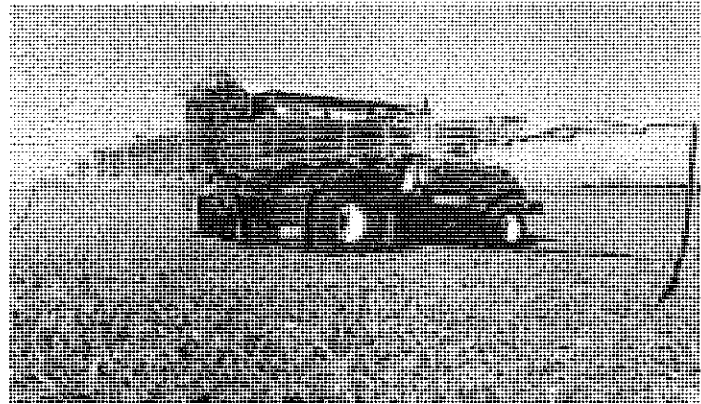
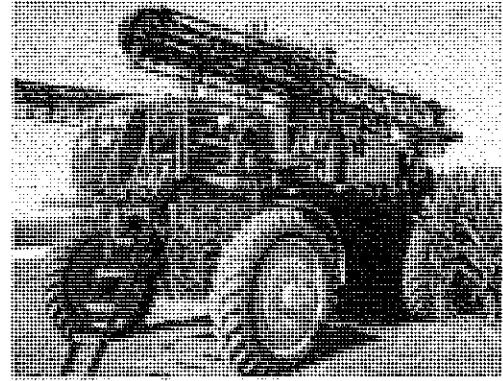
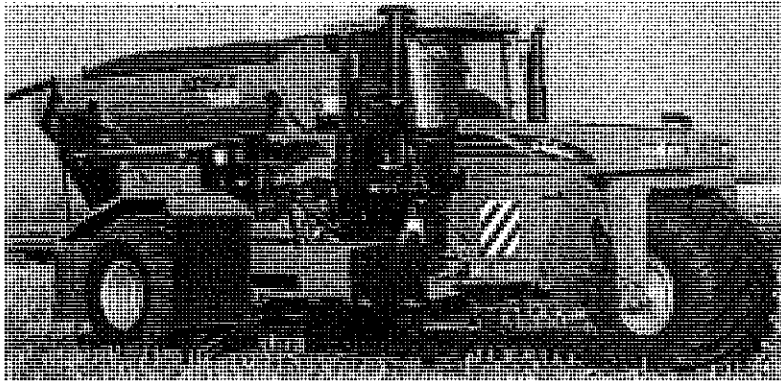
However, if the travel distance to a farm field raises questions about whether it is an implement of husbandry because of the phrase "used primarily off-road," this configuration would not meet the requirements of S. 347. It would be ironic if that was the determination since this tank ends up being

pulled behind a tractor to apply fertilizer to a farm field.

- **Definition of "Implement of Husbandry – Commercial Motor Vehicle" and maximum width.** Cooperative Network appreciates the Study Group's recommendation to accommodate this type of implement of husbandry that has been used in Wisconsin for many years. Regarding the use of the words "used primarily off the highway," in the definition of an "IoH-CMV," Cooperative Network also

recommends replacing these words with "its primary purpose is for off-highway use," as discussed above.

With such a broad and previously undefined class, there has been little guidance for manufacturers who have been making implements of husbandry for decades with platforms that start from a truck chassis. There are numerous kinds of self-propelled, commercially built application equipment that could potentially fall into this classification that exceed the recommended maximum width of 10 feet. A few pictures are included to illustrate some of the confusion that may arise from this definition. Each of the pictured vehicles is used to apply commercial pesticides or fertilizers. However, the interpretation of this definition may, but should not include any of the pictured IoHs since their purpose is generally the same.



In regard to self-propelled application equipment, this definition will create confusion as to which width restriction applies, 15 feet or 10 feet. The rationale for creating a tighter width restriction on application equipment that is commercially manufactured for off-road use on the basis of whether it is built from a truck chassis doesn't make sense. Cooperative Network suggests that all commercially built, self-propelled application equipment be classified as an implement of husbandry and specifically be added to the examples of other equipment in the definition of "implement of husbandry."

Further, Cooperative Network also suggests that the maximum width for "IoH-CMV's" be increased from 10 to 12 feet. Today, the best guidance a person has for the maximum width allowed for an implement of husbandry is found in S. 348.05(2)(c)) of the state statutes that specifically addresses tractors and limits their width to 12 feet. While other towed implements with a width in excess of 8 feet 6 inches were contemplated by the statutes, the law does not restrict their width. It is plausible to conclude that a maximum width of 12 feet became the "default" standard for many types of self-propelled IoH-CMV's operating in Wisconsin. Further support for this, based upon inquiries to our members, indicates that most self-propelled IoH-CMV's do not exceed a width of 12 feet. For these reasons, Cooperative Network suggests raising the proposed maximum width from 10 to 12 feet for IoH-CMV's. A maximum width of 12 feet for IoH-CMV's is significantly less than what is proposed for tractors and towed implements and is consistent with the only limit currently established in the state statutes for an implement of husbandry.

- **Multi-jurisdictional approvals.** Based on the feedback from the Town Hall meetings and conversations with our members, the recommendations of the Study Group, if implemented as proposed, will require the vast majority of producers and agribusinesses to seek annual approvals from local jurisdictions to operate implements that will exceed the size envelope or weight restrictions. In a typical season, it is not unusual for our members' application equipment to be used on 30,000 acres a year. Some of this equipment will exceed the proposed size or weight limits and therefore, a route map and approval for its use would be required for every town and county jurisdiction that it travels in. On a daily basis, that can be as many as three counties and countless towns.

It is not realistic to believe that a firm route for the equipment's use can be prepared a month or even a week in advance. Field conditions dictate on a daily basis when and where this equipment will be used. While it is necessary to incorporate a process for using equipment in excess of the size and weight restrictions, there are many uncertainties that arise from the sheer number of persons who will be required to seek approval from many jurisdictions that individual farmers and agribusinesses operate in. Do the towns have the capacity to review and process what will be a large number of approval requests? Will the process be consistent across the jurisdictions? What will be the turn-around time? Is there an appeal process if an applicant is denied? For towns that will use a permit system, what is a reasonable fee schedule? A process that would require multiple jurisdictional approvals for the very large inventory of equipment that is in use today will be very cumbersome and inefficient.

This concept needs to be reexamined with greater consideration given to the creation of a model process. This approach does not need to strip a jurisdictional authority of its powers, but the goal should be the establishment of a nearly uniform process that provides greater clarity for all persons involved, regardless of the jurisdiction.

- **Empty weight configuration.** Cooperative Network agrees that where it is possible and practical, operating larger vehicles in an empty configuration is a good best management practice. However, absent in the Study Group's recommendation is consideration for when it is not practical or possible to operate in an empty configuration. There are several situations where it is not possible to load a piece of equipment in the field due to physical limitations of the location. Often equipment may need to be loaded at a "nearby" location, such as a farm that can accommodate a tender truck. Further, an applicator may need to cross a road or travel a short distance down the road to an access point for an adjacent field. It is not reasonable (or sometimes not possible) to expect equipment to be unloaded before it crosses the road or travels a short distance to access another field. This recommendation should be amended to allow incidental travel on roads in a loaded configuration between loading and application sites and to access nearby fields.
- **Over-width warning devices.** While the report suggests that the use of warning vehicles may be appropriate, Cooperative Network would suggest an alternative could be the use of flashing amber lights. Wisconsin statutes section 347.26(10) already includes a provision for oversize vehicles. One possibility would be to amend the statutes to include a provision that requires an implement of husbandry of a certain width or larger to be equipped with flashing amber lights to delineate the width of the vehicle. The motoring public is already attuned to the associated hazards with the use of these devices, and lights may be a better alternative to a warning vehicles because they are attached to the implement and would define the actual width of the vehicle.
- **Loss of efficiency, stranded costs.** While producers will have a much greater inventory of equipment that will exceed the recommend size or weight limits in a loaded configuration (and some in a non-loaded configuration), agribusiness does operate some larger equipment including AGCO Terragators that would exceed the proposed weight limits in the unloaded configuration. While Cooperative Network appreciates the inclusion of a process that may allow the use of this equipment on a town-by-town or county-by-county basis, our members are very concerned that its use may be denied in some jurisdictions where it operates today (see multi-jurisdictional comments above). With a price tag that can approach \$500,000 per machine, it would be a considerable loss to our members if they were unable to use this equipment to recapture the significant investment they have already made.

As mentioned in our comments about multiple jurisdictional approvals, a model approach to allow the continued use of this equipment should be pursued. Further, the model should not close the door to innovation or impose a phase-out of equipment based upon its weight or other size considerations.

- **Clearance for power lines.** Cooperative Network also represents all 25 electric cooperatives in the state. The language used to create an allowance for an implement of husbandry in excess of 13.5 feet is concerning. The clearances in the National Electric Safety Code and Public Service Commission (PSC) rules exist for public safety. The recommendation that "The IoH operator is responsible for ensuring there are no conflicts with over-head obstructions, such as wires or structures" assumes that

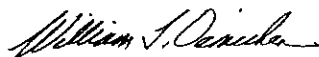
the operator is knowledgeable of the hazards overhead power lines pose. Clearances vary depending on whether the lines are secondary, primary, or transmission power lines. As an example the table included in Appendix B of the Phase II report is for secondary lines up to 750 volts. Section 232 of the National Electric Safety Code includes clearances for power lines up to 22,000 volts. Also, nearly all primary power lines (not just neutrals) are bare wires. Cooperative Network recommends that the Study Group consult with the PSC to develop language that clearly communicates that a simple clearance to avoid contact is insufficient and ultimately if there is any doubt, the farmer should contact their local utility.

Lastly, an aspect that should not be lost in these discussions is the Study Group's guiding principles, and specifically that agriculture must continue to remain a competitive, major contributor to our state's economy. Agriculture has become a more concentrated industry due to external economic and regulatory forces beyond our state and national borders. While there must be a balance, decision makers must also be aware that tighter constraints on the use of implements of husbandry will undo efficiency gains already achieved. In reality that will mean smaller vehicles, greater and longer sustained traffic volume to move the same amount of material, increased costs for agribusinesses (passed on to producers), and greater expenses incurred by producers for their own operations, and may trigger other road safety concerns.

The timeline from the introduction of this issue to the Study Group to their drafting instructions was very short for an issue of such large magnitude. The value of research should not be understated nor should the implications of Wisconsin's de facto leadership of being the first Midwestern state to set new standards for weight limits and the size of implements of husbandry. By the Department of Transportation's admission, to do a comprehensive engineering analysis would take more than two years. The results from what will be perhaps the most comprehensive study that evaluates implements of husbandry pavement impacts by Iowa State University that began in 2007, won't be completed until 2015. Yet, these recommendations came forth in less than one year, and are based on data extrapolated from a Minnesota study that, while detailed, only studied the impact of four agricultural vehicles (a grain cart, a three-wheel and four-wheel terragator, and a tracked tractor) on paved surfaces. It would be beneficial for the report to identify data gaps where additional research or engineering analysis would help close knowledge gaps and result in recommendations with a greater level of confidence.

Cooperative Network appreciates the Town Hall outreach efforts made by the Wisconsin Department of Transportation and the opportunity to submit comments on behalf of our agribusiness cooperative members.

Sincerely,



William L. Oemichen
President & CEO

My wife and I farm 2500 acres in Dunn and Eau Claire County, raising dark red kidney beans, corn, soybeans, small grains and potatoes. Our base operation is in the Town of Spring Brook where we've had paved roads since the before we started farming. It's been a real joy farming in an area that has great roads. We appreciate that and understand the need to work with DOT and DATCP to keep good roads while at the same time developing solutions that aren't burdensome on our farming operation.

We plant our fields with 16 – 30" rows; our equipment is 40' wide but folds to a road width of 22'. Our farming season runs from early April through November. The tillage equipment ranges from 15' to 22' wide. The rotary hoes, cultivators, bean windrowers and the corn-head for the self-propelled combine will average about 22' in width. As you can see we exceed the 15' recommendation with the majority of our IoH. Our other concern is the weight of Category I T-8 articulated tractors, that type of tractor in our operation may be over the bridge law weight.

We will be burdened with the task of obtaining written authorization so we can exceed the width limits in multiple townships; in our case we may be dealing with multiple municipalities. The time necessary to provide a transportation plan including routes, approximating times of travel for multiple pieces of equipment will be onerous. There will be many townships where authorization may not be granted if an anti-farming group serves on the towns board. We also wonder how the township staff will handle the additional administration of the plan along with the compliance that will be required by the state.

The IoH that we operate are used in the field 95% of the time. The only reason there is any road time involved is in transit from one field to another. We have a limited window of time to get the crops planted, cultivated, sprayed and harvested. We do have to operate equipment over the weekend and after dark. Though we try to limit the night operation as much as possible, it's not always practical. Our time frame for performing field operations depends on the weather and we are often struggling to get it done.

We are opposed to the restrictions as presented by the committee and respectfully ask that different solutions be found prior to it going to the legislature.

Luther and Virginia Grown
N3189 Cty Rd H
Elk Mound, WI, 54739-9238
Office 715-874-6558
Cell (715) 271-3045

To whom it may concern:

The Town of Franklin-Kewaunee County has some concerns about the Implements of Husbandry recommendations made by the special study group.

The first concern is the recommendation to raise the weight allowance for any IoH. The Town of Franklin is already struggling to maintain our roads with our limited budget. We are only allowed to raise property taxes by 2% and expenses are increasing at a much faster rate. We do not have any additional funds to repair roads that may be damaged by the increased weights of the IoHs.

Many of our expenses are increasing every year while our funding has remained basically the same. An example of this would be our snow plowing expenses. Snow plowing expenses vary from year to year and would range from about \$30,000 to \$53,000 per year. We have been notified that some of the costs associated with snow plowing will almost double for the 2013-2014 winter. This expense will create an even greater hardship to our town roads and will take away from any necessary road maintenance. Our town bridges are also aging and we have no extra money to make updates. Many other expenses have greatly increased, including fire services, road repair and maintenance, and road building expenses.

The next concern is the height and width requirements. You recommend a maximum height and width yet you are allowing the farmers to self-regulate themselves and go above the maximum when they view it as safe. Why are you setting any maximum if it is up to the opinion of the farmer if they would like to go above the maximum?

The third concern is the proposed written authorization. This is putting a lot of responsibility on town officials to check driver's licenses, check any IoH for lights, markings and safety requirements, and making sure a route plan is submitted before and work is performed. Can we charge for this written authorization and what are the consequences if the requirements are not followed before the IoH is on our roads?

The final concern is the self-certification system for IoH CMVs. Who would ensure that these vehicles are safely maintained to be on the roads and not endanger the safety of other vehicles on the road?

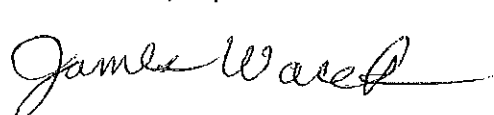
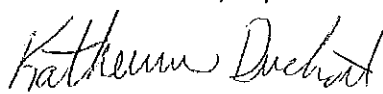
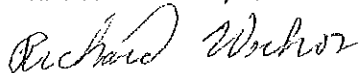
We appreciate the study group's efforts to address this issue and look for possible solutions. We feel it is necessary to consider the consequences on our roads and budgets before making any changes for IoHs.

Sincerely,

Richard Wochos, Chairman

Katherine Duckart, Supervisor

James Wacek, Supervisor



August 29, 2013
DOT Town Hall Meeting
Green Bay, WI

Dale and Deb Mielke
W12675 Keller Road
Marion, WI 54950

Dale and I operate a dairy in Marion. We are not considered a large dairy as we milk 320 cows. Deb is president of the Shawano County Farm Bureau and we've been discussing weight limit regulations and Section 348 and 349 at our board meetings. As of last week at our policy and development committee meeting I was under the impression that the width limit for implements of husbandry of 15' would be a problem for our operation and for the most part it doesn't when it comes to our disc which is 14', self propelled chopper of 14' and our largest tractor with duals of 13'. However, our self propelled discbine is 15'6" and our 6 row corn planter is 15'8". Now these implements do take up most of the county road widths which are 22' wide with 3-4' shoulders. We are not considered a large operation, but some of our machinery is already over the proposed width of the 15'. Our closest town road is only 19". An average vehicle of 7.5' including mirrors, would not be able to pass safely.

The proposed weight limitations also propose a problem for us. When it comes to manure hauling, our JD8420 tractor weighs in at 27,415" and the 6200 gallon manure spreader weighs 70,000# with three axels. When loaded these two implements form a combined weight of 97,415# (5 axels). And, of course, this exceeds the 92,000# allowance.

Deb Mielke

Here is a more serious problem to consider. A mounted piece of equipment on a tractor will not only add weight to the axle it is attached to but will pull weight from the other end of the vehicle. For example you take a 40,000 pound tractor and put a 15,000 pound 3 point implement on the back, the axle weight will be 20,000 half of tractor weight + 15,000 3 point implement + an additional 15,000 pulled from front of tractor equaling 50,000 pounds new rear axle weight. This is going to be a huge problem. Now remember this tractor performs it work in the field so it only travels the highway to go between fields. The number of trips on the road is minimal but illegal just the same. If everyone else is getting fines for traveling the road over weight, then the finger will be pointed at the implement that is getting away with the one or two trips per day. This is going to be a huge problem. I propose an exemption let's say for 4 trips per day on a road, because the duty cycle is doing the damage.

If 60% of the farmers have no idea what things weigh then how can they even give input to the problem. The DOT needs to do an investigative research into the weight of the farm machinery running on the roads even if only used once in the while.

Custom for hire agriculture needs to be treated the same as a farmer. If the state feels farmers need special help to keep cost down then custom for hire agriculture should have the same help, since the farmer is still paying for the job.



FRONTIER-SERVCO FS



222 East Puerner St., Jefferson, WI (920) 674-7000 or 2311 Clermont St., Antigo, WI (715) 627-4844

Rory Rhinesmith
WisDOT
4802 Sheboygan Ave Room 451
PO Box 7910
Madison, WI 53707-7910

Frontier-Servco FS, a division of GROWMARK Inc. is a retail agricultural company doing business as a cooperative. We currently operate in thirty-two counties from twenty-two locations in the state of Wisconsin. As a provider of agriculture products and services, Frontier-Servco FS is very concerned with the recommendations of the IoH Study Group.

We feel that some of the recommendations are an overreaction to a few bad apples within our group. The majority of our custom application units do not exceed FBF when empty. Most of our dry machines weigh less than 32,000 pounds when empty and our liquid machines weigh less than 28,000 when empty. We currently have thirty-one custom machines in our fleet. As with most retailers, we have invested significant monies into these machines and imposing regulations, possibly without benefit, would cause financial harm to our business and ultimately to those farmers that utilize our custom services. These machines have a cost, when new, of anywhere from \$295,000 to over \$400,000 each. We could certainly try and work with manufacturers to develop smaller machines, however, I do not believe they will build custom machines just for Wisconsin.

Farming certainly has its challenges and being able to plant and harvest on a timely basis can make or break a farming operation. Our ability to cover a large amount of acres in a small amount of time is critical to the farmers that are trying to get their crop in or out. Finding alternative solutions will cause a major disruption during the busy season. Having these vehicles travel unloaded to the producer is not cost effective. This will cause a need for more staff, more fuel, and additional equipment and cause an increase in cost all around. If these vehicles travel unloaded there will be a need for large tender trucks to travel with the equipment to the field location. In many cases these tender trucks weigh much more than the equipment causing increased use and potential damage to the roadway. Farmers have continued to buy bigger equipment in order for them to be more efficient. We have just followed suit. I don't believe that we would want to create a situation that would put a Wisconsin farmer at a competitive disadvantage to farmers in other states, because of regulations.

Width of the IoH is also an issue. The width of many of our current custom application machines is already at eleven feet. In fact, we have two machines that are eleven feet one and one half inches. We have operated these machines on rural roadways for many years without incident. These machines have lights and turn signals. This dimension should be looked at and extended to meet the needs of the equipment being used. This measurement would not have to be increased by much to include the majority of custom application machines.



FRONTIER-SERVCO FS



222 East Puerner St., Jefferson, WI (920) 674-7000 or 2311 Clermont St., Antigo, WI (715) 627-4844

Permits for the larger machines were also discussed in the study. This would be very difficult to accomplish. There are days when a single custom machine will operate in five or six townships in two different counties. Would these permits be issued locally? What hours and/or days would permits be available. There are many times we get a call when the farmer comes in for the night, asking for application the next day.

Frontier-Servco FS understands that our roadways are important and need to be properly cared for and maintained. I do believe that we need to stop 120,000 pound loads that some operators are using. However, let us not build regulations that encumber those operations that utilize machines that carry less than 50,000 pounds when fully loaded. It is important to work together to come up with a solution that will best fit everyone's needs. Further study needs to be completed along with alternatives before imposing these regulations.

Thank you,
Bruce Barganz

Frontier-Servco FS

Letter B

Rory Rhinesmith, WIS DOT

August 26, 2013

P.O. Box 7910

Madison, WI 53707 – 7910

Subject: IoH Study Width and Length limitations.

Dear Rory:

I am contacting you regarding the **IoH section** on width and length limitations.

The Brillion Farm Equipment Division of Landoll Corporation manufactures tillage and seeding equipment that is used throughout the United States. We have a lot of customers in Wisconsin that have been loyal to the Brillion brand for several generations.

I have been the General Manager of the Brillion Farm Equipment starting in 1990 until its purchase in 2010 by Landoll Corporation of Marysville, KS. I currently manage the Brillion Farm Equipment Division sales, service and engineering departments headquartered in Brillion, WI.

Regarding operating width. Our most popular Brillion machines have a transport width of approximately 17'6". It would be important not to limit the width too narrow for modern farming equipment. It is extremely difficult to design larger machines that when folded would be under this width. To design a unit that would fold under this dimension would be very difficult and the additional cost to the customer would be significant.

The article I read regarding the study also stated that the DOT would allow a maximum length of 60 feet for a single piece of farm equipment; 100 feet for combinations of two; and 70 feet for a combination of three.

It is a common agricultural practice in Wisconsin and across the country for a tractor to pull a Field Cultivator (or disk harrow) followed by a Brillion Pulverizer. The Brillion Pulverizer breaks up clods, firms the seedbed and rolls down stones to improve yields and reduce breakage to harvesting equipment. Pulling this combination in one pass saves time, saves fuel, reduces compaction, reduces downtime and increases yields.

The common overall length of the three units can total up to 95'. This is beyond the 70' stated in the article. I would ask you to increase the overall length to 100' to accommodate this very common practice.

Best regards:

Michael Irish

Brillion Brand Manager

Brillion Farm Equipment

Brillion, WI 54110

michael.irish@landoll.com

8-25-13

To all concerned parties,

It has recently been brought to my attention that the WI DOT has been studying the effects of implements of husbandry (IOH) on WI roads. Because I am a concerned farmer and taxpayer, I have taken the time to read the phase 1 and phase 2 reports. While I believe both reports contain some well thought out and logical information, I also believe both reports are somewhat biased and skewed to support an ultimate goal. Neither report fully examines the pros and cons of alternate options other than the options recommended. Nor are the reports as thorough as I would expect them to be, considering the rule changes proposed would affect an extremely vital WI industry (\$59.16 billion according to the phase 1 report).

No true scope of the problem is defined with a monetary value or accident totals. There is very little supporting evidence presented that these rule changes would save any taxpayer money or reduce the number of accidents at all. What the reports do include is a few pictures of worst-case scenarios, descriptions of isolated incidents and information that only supports weight, width and length restrictions. To the best of my understanding, I believe relevant height restrictions and policies are already in place.

Regarding the weight restrictions, it is obvious that increased weight is going to damage WI roads to a greater extent than lighter loads. But a key piece of engineering information is missing from the report altogether, what about frequency? Other than loads that are in excess of the pavements design structure, what role does frequency in conjunction with weight play in damage to the pavement? How do the proposed rule changes affect frequency at all?

The phase 2 report also mentioned the idea of using a semi-trailer for loads such as self-propelled forage harvesters and combines. Aside from the fact that most farmers do not have the necessary access to a semi-tractor trailer to get their job done in a profitable manner, the same amount of weight plus the weight of the tractor trailer is still going to be carried over the roadway on tires that have less contact with the road than the OEM tires. It has also been my practical observation that immediate damage to the roadway is often caused by loading and unloading of heavy equipment from semi-trailers (construction equipment included), which can quickly negate other benefits.

The width restriction recommendations also seem to be missing some key information. Increased width definitely leads to some transport challenges for both motorists and IOH operators, but slow speeds and the fact that IOHs can be moved to the right of the centerline minimizes this issue. Do accidents occur at a higher rate when increased width IOHs are involved compared to accidents in the general driving population? How is a permit going to solve the problem? This equipment needs to be transported in a timely manner from point A to point B on a schedule dictated by variables outside of the operator's control, such as weather and operating conditions.

I truly do not understand the proposed length restrictions. With two pieces of equipment 100' is recommended and with three pieces of equipment 70' is recommended. This makes no sense! The total length of an IOH train should be the only idea in question with these restrictions. The idea of vehicle sway is completely blown out of proportion. It has been my observation that the amount of

sway is greatly affected by the condition of the equipment and the length of the vehicle train is only a secondary factor. Once again, the proposed restrictions do not address the root cause of the concern.

WI farmers are only trying to get their job done in an efficient, safe and reasonable manner. They are not taking unnecessary routes or making extra trips down the road to complete their job. They realize that safe uneventful trips on the road are the most productive. And they drive their cars on the same roads that all of us do. Damaged roads are not desirable for anyone.

There is most likely room for improvement in specific areas, but in my experience to make blanket rules that cover all situations is ineffective and counter productive. If our government officials had taken the **rules only** approach to solving our infrastructure problems in many years gone past, we would still be driving on dirt roads with horses and wagons. While I agree there is a definite need for proper rules and regulations, I strongly believe fewer resources should be wasted on administrative and legal blame transfer. We need to make the best use of our resources and focus our emphasis on proper infrastructure design to keep our great state of Wisconsin competitive on a global scale.

Thank you for your time,

Jason Sturn
W9356 Country Cove Lane
Hortonville WI

920-779-9538

Rory Rhinesmith

22 Aug. 2013

Dear Sir:

As a rural resident of the Central Sands area, we agree that something has to be done concerning our roads and size of large farm equipment in all Counties and States.

This is not the small farmer, this is the Large factory farms who have already received federal subsidies and special privileges. Who now are abusing the provisions.

Throughout the four seasons in WI, (yes even winter) we experience Constant equipment traffic; Farm Waste Haulers, High-Boys, Canning Equipment, Semi-Trailers, gravel trucks and planting/harvest equipment or highway graders.

We have lost our mail box/post two times, and have "grooves" in our newly paved highway when equipment

moved from the south side of the highway to the North side?

The "High-boys", "planters and harvesters" take-up the entire road, leaving it impossible to pass, or get-by when you meet them. Potato trucks are allowed to drive without a license; they are abusing this, they haul potatoes from storage bins to the processing areas even in winter. The semi-trailers are over-loaded and get-by I-39 scales by using frontage roads and alternate Hwys. Manure haulers are heavy, leaking and causing traffic hazards.

We realize that WI is an agriculture community and is needed to feed our population. We also realize that it employs numerous people (seasonally) but more attention, restrictions and safety issues must be addressed.

Thank you for considering changes.

Donna/Bob Windschiegl

1000 North Oak Avenue
Marshfield, WI 54449-5790
715-389-4999
1-800-662-6900
FAX 715-389-4996
<http://marshfieldclinic.org/nfmc/>

Letter A



August 20, 2013

Rory Rhinesmith
WisDOT
4802 Sheboygan Avenue, Room 451
P.O. Box 7910
Madison, WI 53707-7910

RE: Impact of Ag Equipment on Roads (proposal that operators be 18 years of age and hold a valid driver's license)

Dear Mr. Rhinesmith:

Thank you for the opportunity to comment on the proposal that operators driving agricultural equipment on the roadways be 18 years of age and hold a valid driver's license. I fully support the proposal and recommend extending this age limit/driver's license requirement beyond just loH vehicles that exceed the size envelope and weight limits (as now proposed). The age limit/driver's license requirement should apply to all loH on public roads.

I am a research scientist with the National Farm Medicine Center in Marshfield, Wisconsin. I have completed a number of research studies on the topic of youth and tractors, with the goal of preventing injuries and fatalities to youth operators. Most pertinent to your proposal is an evaluation of Wisconsin ACT 455 requiring youth under 16 years to complete a tractor certification course in order to operate tractors and machinery on public roads. I have enclosed the article for your review. The bottom line: there was neither a significant change in the number of youth tractor crashes after the law was passed, nor any reduction in the proportion of crashes where the youth operator was designated at fault. Further, the tractor certification course did not cover the major factors contributing to youth tractor crashes on public roads. This led me to write an editorial in an agricultural safety journal (also enclosed) proposing that youth have a driver's license to operate tractors on public roads.

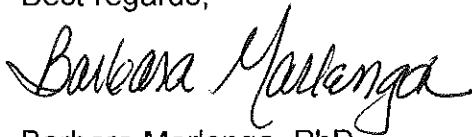
My research team has conducted additional studies that provide scientific evidence to support the recommendation that youth be older before they operate

tractors. We found that: 1) the activation forces required to operate the most common tractors on US farms typically exceed the physical abilities of most children aged 13-17 years, 2) many tractor controls cannot be effectively reached by the majority of youth, and 3) youth operators typically have diminished fields of vision compared to adults, with the greatest degree of visual limitation for objects at close distances and when objects are straight in front of the tractor. I have enclosed these papers for your review.

In summary, I recommend that operators be 18 years of age and hold a valid driver's license to operate *any* loH on public roads. My recommendation is not for the sake of preserving the roads, but the sake of preserving our youth and farm families in Wisconsin.

Please contact me if you have any questions.

Best regards,

A handwritten signature in black ink that reads "Barbara Marlenga". The signature is written in a cursive, flowing style.

Barbara Marlenga, PhD
Research Scientist
National Farm Medicine Center
1000 North Oak Avenue
Marshfield, WI 54449
Telephone: 715-389-3021
Email: marlenga.barbara@mcrf.mfldclin.edu



ASSOCIATION OF
EQUIPMENT MANUFACTURERS

AGRICULTURE
CONSTRUCTION
FORESTRY
MINING
UTILITY

August 1, 2013

The Honorable Mark Gottlieb
Wisconsin Department of Transportation
Hill Farms State Transportation Building
4802 Sheboygan Avenue
P.O. Box 7999
Madison, WI 53707-7999

Dear Secretary Gottlieb:

The Wisconsin Department of Transportation (WisDOT) has been facilitating an Implements of Husbandry Study Group with the goal of gathering information and data to develop a report for your office. The intention of this report is to guide important decisions regarding the regulation of agricultural equipment on Wisconsin roads. The Association of Equipment Manufacturers (AEM) and its members have been active participants in this Study Group.

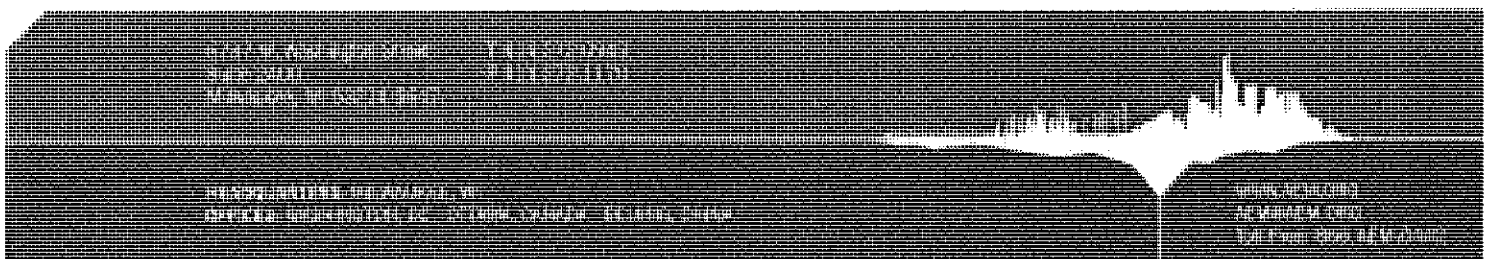
AEM is the Wisconsin-based international trade group serving the off-road equipment manufacturing industry. AEM members number more than 850 companies that manufacture equipment, products and services used worldwide in the agriculture, construction, forestry, mining and utility fields.

Given the speed with which the recently distributed Phase II Report was delivered and the expansion of purpose we now wish to express our dissatisfaction with the stated conclusions and intended use. Recommendations are offered below.

The Study Group was originally formed to examine damage to rural roads resulting from the high frequency of travel of animal waste transport occurring at certain times of the year when the roadbed was most susceptible to harm. However, the group has expanded its scope to include nearly all categories of agricultural equipment, including several types that have historically been considered exempt from permits and regulatory controls. If this initiative was allowed to continue as is, the scope creep could result in numerous new regulatory burdens placed on Wisconsin farmers, ranchers and dairymen, equipment dealers and equipment manufacturers.

The Study Group's significant departure from its reasons for formation created a large data deficit threatening the ability of their reports to contain useful and substantive conclusions to guide critical policy decisions. The group responded to this lack of data by demanding large amounts of technical and commercial information from equipment manufacturers that in many cases simply does not currently exist.

The time frames given to manufacturers to deliver the requested data were far too aggressive. The Study Group has ignored repeated requests for additional time to gather the desired information. Furthermore, these continual requests for technical and commercial information have been made with no clear explanation of how it will be interpreted and utilized.



Industry discussions continue to take place in an effort to figure out an appropriate response. The speed with which the WisDOT has moved this highly technical issue forward with little initial visibility of intent has left major industry players:

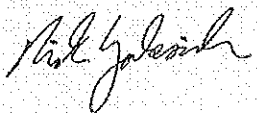
- short on analysis time for significant aspects of the breadth and technical implications of the soon-to-be-proposed legislation and;
- limited time to educate significant areas of their organizations for making appropriate responses until late in the process – specifically public relations & governmental affairs.

We have several issues being analyzed at the moment that need to be brought forward but given the current time line this is not possible.

Unfortunately, the Study Group has chosen to issue their Phase II Report without critical data points developed in a collaborative process so they could adhere to an overly ambitious and arbitrary time frame. We feel this could lead to misinterpretation of agricultural equipment's role in any decisions WisDOT derives from the Study Groups efforts. This has the potential to further complicate the regulatory environment confronting agricultural producers as they will not only find themselves having to follow a new stack of regulatory requirements, but poorly crafted and hastily developed regulatory requirements.

Our organization has worked with the Study Group and wishes to continue to do so. With this in mind we recommend the process continue by re-directing the Study Group to its original scope of commercial animal waste/nutrient transport operations. Once that is established we can work to establish better relations between transport infrastructure engineers, agricultural producers and agricultural equipment manufacturers and dealers with the goal of clearly defining the issues and working toward mutually beneficial solutions.

We appreciate your time and attention to this important matter and look forward to working with your office to address our concerns. If you have any questions please do not hesitate to contact Nick Tindall, AEM's Director of Government Affairs at ntindall@aem.org or 202-898-9067.



Nick Yaksich
Vice President
Government & Industry Relations

cc: (sent via email)

Governor, Scott Walker
Secretary of Agriculture, Ben Brancel
President of the Senate, Senator Michael Ellis
Speaker of the House, Representative Robin Vos
Chairman, House Agriculture Committee, Representative Lee Nerison
Chairman, Senate Committee on Agriculture, Small Business and Tourism, Senator Terry Moulton
Senator Jerry Petrowski (Chief of Staff Tim Fiocchi)
Representative Keith Ripp

MEDA 130373
DTSD



MIDWEST EQUIPMENT DEALERS ASSOCIATION

5330 Wall St., Suite 100, Madison, WI 53718-7929
608-240-4700 • 800-236-6332 • Fax 608-240-2069
E-Mail: mail@medaassn.com • Website: www.medaassn.com

July 31, 2013

The Honorable Mark Gottlieb
Wisconsin Department of Transportation
Hill Farms State Transportation Building
4802 Sheboygan Avenue
P.O. Box 7999
Madison, Wisconsin 53707-7999



Dear Secretary Gottlieb:

As the Executive Vice President - CEO of the Midwest Equipment Dealers Association ("MEDA"), I am writing on behalf of Wisconsin equipment dealers to express concerns about recent developments with respect to the Wisconsin Department of Transportation (WisDOT) Implements of Husbandry Study, including its Phase II Report to your office.

No representative of MEDA or any of its Wisconsin dealer members was asked to actively participate in the Implements of Husbandry Study. However, in light of the likely impact of this initiative on MEDA's members and their agricultural producer customers, we have been reviewing the Study's reports with keen interest. The regulations under discussion will have a great impact on the ability of our agricultural producer customers to effectively operate the equipment necessary for their businesses to function. These regulations will also affect our members' ability to transport equipment to their dealerships and then to their agricultural producer customers.

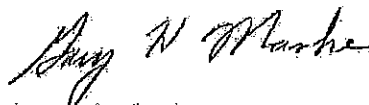
Viewing the Study's proceedings from the outside, we were not informed about the Phase II Report or its findings until the end of last week, and we further learned that a deadline for comments on the report was set for just three business days later: July 31. The current timeframe essentially prohibits any opportunity for us to inform our members about the Study's findings, answer questions about the findings, and then seek feedback from these local Wisconsin dealerships about the impact of the Report's recommendations on their ability to do business in Wisconsin, as well as the impact on our dealers' agricultural producer customers. Not only does the current timeframe indicate a lack of any consideration for the impact of these recommendations on a core Wisconsin business sector, this short feedback period squanders an opportunity for the Study to produce a far superior work product by incorporating the real-life concerns of the equipment dealers and agricultural producers who will live with the final regulations on a daily basis.

It is our understanding that the Study was originally formed to examine a specific concern—damage to rural roads from high frequency travel of animal waste occurring at certain times of the year when the roadbed was most susceptible to harm. The Study has since expanded, however, to include nearly all categories of agricultural equipment, including several types that have been considered exempt from permits and regulatory controls. In light of this substantial shift in scope, it is critical to Wisconsin's agriculture industry that Wisconsin equipment dealers have a fair opportunity to contribute feedback on the Study's findings and recommendations.

MEDA has been communicating with its members about the progress of the Implements of Husbandry Study. We will be reporting on the Phase II Report and seeking feedback over the next several weeks. After we have walked through these issues with our dealers, we anticipate that we will be able to contribute productive feedback to assist regulators and the legislature in crafting responsible regulation that addresses the goals of the Study while considering the real impact of any regulations on Wisconsin agriculture. Our Wisconsin members desire to be responsible corporate citizens. We ask only for the opportunity to be helpful to the shared goals of creating a welcome environment for doing business in Wisconsin while being responsible stewards of our infrastructure and environment.

We appreciate your time and attention to this important matter and look forward to working with your office to address our concerns. If you have any questions please do not hesitate to contact me at your earliest convenience.

Sincerely,



Gary W. Manke CAE
Executive Vice President -CEO

cc: Governor Scott Walker
Secretary of Agriculture Ben Brancel
Senator Jerry Petrowski
State Representative Keith Ripp

July 31, 2013

The Honorable Mark Gottlieb
Wisconsin Department of Transportation
Hill Farms State Transportation Building
4802 Sheboygan Avenue
P.O. Box 7999
Madison, WI 53707-7999

Dear Secretary Gottlieb,

The Wisconsin Farm Bureau Federation appreciates the opportunity to have a representative participating in the Department of Transportation Implements of Husbandry working group. Throughout this process we have examined a wide array of topics impacting agriculture including equipment size and specifications, road standards, transportation funding, Federal Bridge Formula, assessment of our roads and bridge system, enforcement action and permitting processes. This working group took on an issue with significant impact to agriculture, one of the largest economic drivers in Wisconsin. We have some concern that the scope of this working group has ballooned and expanded to topics that were not the intention of the original basis for this working group. Given the expedited timeline for a deliverable report, it is concerning that some of the topics included within the report were not given ample time for evaluation and discussion.

In response to the recommendations within the Phase II Draft Report released by the Wisconsin Department of Transportation on Friday, July 26, 2013, the Wisconsin Farm Bureau Federation has several comments. The following are a brief overview of comments, given the limited time between when the report was issued, revised, and the set comment deadline. These are in no way exhaustive, and due to the rapid time deadline, have not been examined by our organization's leadership or membership.

- There are two versions of the report and report overview summary distributed on Friday, July 26, 2013 and one of the drafts states that there will be a 15% weight allowance for Implements of Husbandry (IOH) with a permit. Throughout the discussions during working group meetings, the understanding was that the 15% weight allowance would be provided without a permit. Any equipment in excess of the 15% weight allowance could apply for a permit.
- The 15 foot width requirement for IOH is concerning based on the rationale from DOT staff that this suggestion came from the existing dimensions that are allowed on commercial wide load permits issued. Agricultural IOH are currently exempt from width requirements and many existing pieces of equipment exceed the recommended width allowance proposed by DOT. Sweeping changes will affect a significant number of farmers throughout Wisconsin. This topic should be offered further consideration and examination rather than the sole reference to existing commercial wide load permits.

- There is no mention of a grandfather allowance or timeframe for any of the equipment whose measurements exceed the Phase II Draft Report recommendations. Thousands of Wisconsin farmers have millions of dollars invested in equipment that is in use and very functional that will require a permit according to the recommendations of this report. Without a proposal to continue use of the existing operating equipment or consider a phase in period, we find that this is an unreasonable request and an undue burden the farmers using this equipment as well as equipment manufacturers and retailers. The timeframe to engineer, draft, create, test, reengineer, manufacture, market, deliver and sell to end users is a significant time period that must be taken into consideration.
- The recommendation to permit an IOH under the existing single-trip or multiple-trip permit has not been clearly laid out in this report. The following questions are just a few that are not addressed in the recommendations:
 - Who issues the permits?
 - How frequently do permits need to be issued/requested?
 - Does the equipment get the permit? The farm? The operator?
 - Does a farmer need a permit in every township or county that they operate in?
 - How many farmers will this impact that will be required to obtain a permit?
 - Is this over burdensome for the farmers and/or local municipality?
- The Best Practices recommendations articulated in the report suggest proactive steps to extend the life of roadways while still sustaining a profitable agricultural system. We agree that one of the main focuses of this report needs to be education and outreach of this information. Farmers and local municipalities should be informed about the options available to preserve the roadways while still allowing farming to occur with minimal inconvenience. Practices such as the use of drag lines and pipelines, off-site manure storage and center-pivot irrigation will help reduce the wear and traffic on roads. The option to use temporary, one-way roads during targeted times of the growing season will help reduce stress on road edges. Lastly, specifying targeted areas of stress and wear on the roadways such as heavily trafficked intersections, farm drives and field turn-ins, reinforced road shoulders, and properly drained and supported road sub grade can all help to extend the life of roads and target road funding dollars to specific solutions.

Throughout the next several weeks, we will be distributing this report to our leadership, staff and members to request additional comments and feedback from boots-on-the-ground farmers. We hope through those discussions to have additional feedback regarding the report recommendations including comments, concerns, alternatives and specific examples of implementation that may result from some of the recommendations within this report. At that time, Wisconsin Farm Bureau Federation will have properly communicated this information throughout our organization and will have a more accurate compilation of comments for consideration.

Karen Gefvert
 Director of Governmental Relations
 Wisconsin Farm Bureau Federation

Brotheridge, Kenneth - DOT

From: Vieth, David - DOT
Sent: Wednesday, September 18, 2013 11:07 AM
To: DOT IoHStudyFeedback
Subject: FW: Draft IoH Phase II Addendum 09-13-2013

From: Kevin A. Erb [<mailto:kevin.erb@ces.uwex.edu>]
Sent: Monday, September 16, 2013 8:50 AM
To: Vieth, David - DOT
Subject: Re: Draft IoH Phase II Addendum 09-13-2013

I have no questions or concerns with the revised report

Kevin

On 9/15/13 7:37 PM, Vieth, David - DOT wrote:

Dear Study Group Members and others,

Attached is the draft addendum produced following the discussion held Thursday afternoon, September 12. As we prepare to present this document to Secretary Gottlieb and others, we are offering you an additional opportunity to review the report from that discussion of the group. We welcome any additional thoughts you may have that you feel are important to conveying the sense of the study group. Should you have any questions, you may respond to the IoH mailbox, IoHStudyFeedback@dot.wi.gov, or by replying to me. Please be aware that Ken is out of the office this week, so please respond to the address above or to me atdavid.vieth@dot.wi.gov.

Your prompt review and response will be appreciated as we have further discussion planned early this coming week.

Thank you again for your involvement and assistance in helping add value to this study.

Sincerely,

David Vieth
IoH Study Group Member
Director, Bureau of Highway Maintenance
Wisconsin Department of Transportation
david.vieth@dot.wi.gov
608-267-8999

Brotheridge, Kenneth - DOT

From: Vieth, David - DOT
Sent: Wednesday, September 18, 2013 11:07 AM
To: DOT IoHStudyFeedback
Subject: FW: Draft IoH Phase II Addendum 09-13-2013

From: Richard Stadelman [<mailto:wtowns1@frontiernet.net>]
Sent: Monday, September 16, 2013 10:09 AM
To: Vieth, David - DOT
Subject: Re: Draft IoH Phase II Addendum 09-13-2013

Dave,
On behalf of Wisconsin Towns Association I want to express our support for the draft Phase II Addendum Report to the Secretary of DOT dated September 15, 2013. Thank you to the entire DOT staff that was involved in this project for all their hard work.

Rick Stadelman Executive Director Wisconsin Towns Association

----- Original Message -----

From: Vieth, David - DOT
To: Vieth, David - DOT
Sent: Sunday, September 15, 2013 7:37 PM
Subject: Draft IoH Phase II Addendum 09-13-2013

Dear Study Group Members and others,

Attached is the draft addendum produced following the discussion held Thursday afternoon, September 12. As we prepare to present this document to Secretary Gottlieb and others, we are offering you an additional opportunity to review the report from that discussion of the group. We welcome any additional thoughts you may have that you feel are important to conveying the sense of the study group. Should you have any questions, you may respond to the IoH mailbox, IoHStudyFeedback@dot.wi.gov, or by replying to me. Please be aware that Ken is out of the office this week, so please respond to the address above or to me at david.vieth@dot.wi.gov.

Your prompt review and response will be appreciated as we have further discussion planned early this coming week.

Thank you again for your involvement and assistance in helping add value to this study.

Sincerely,

David Vieth
IoH Study Group Member
Director, Bureau of Highway Maintenance
Wisconsin Department of Transportation
david.vieth@dot.wi.gov
608-267-8999

Brotheridge, Kenneth - DOT

From: Vieth, David - DOT
Sent: Wednesday, September 18, 2013 11:06 AM
To: DOT IoHStudyFeedback
Subject: FW: Draft IoH Phase II Addendum 09-13-2013

For the file and inclusion in report appendix. I will forward all other responses for the same purpose.

From: bdake@wibiz.org [<mailto:bdake@wibiz.org>]
Sent: Monday, September 16, 2013 4:12 PM
To: Vieth, David - DOT
Subject: RE: Draft IoH Phase II Addendum 09-13-2013

David,

I have reviewed the "draft" addendum.

I believe it accurately reflects the sentiments of the WIB Agri-Business Coalition with respect to the safety contingencies for IoH that extend beyond the centerline and our concerns with the efficacy of the written authorization process for overweight IoH.

Thank you for the opportunity to comment.

Respectfully,

Brian Dake
Legislative Director
WIB Agri-Business Coalition

-----Original Message-----

From: "Vieth, David - DOT" <David.Vieth@dot.wi.gov>
Sent: Sunday, September 15, 2013 8:37pm
To: "Vieth, David - DOT" <David.Vieth@dot.wi.gov>
Subject: Draft IoH Phase II Addendum 09-13-2013

Dear Study Group Members and others,

Attached is the draft addendum produced following the discussion held Thursday afternoon, September 12. As we prepare to present this document to Secretary Gottlieb and others, we are offering you an additional opportunity to review the report from that discussion of the group. We welcome any additional thoughts you may have that you feel are important to conveying the sense of the study group. Should you have any questions, you may respond to the IoH mailbox, IoHStudyFeedback@dot.wi.gov, or by replying to me. Please be aware that Ken is out of the office this week, so please respond to the address above or to me at atdavid.vieth@dot.wi.gov.

Your prompt review and response will be appreciated as we have further discussion planned early this coming week.

Thank you again for your involvement and assistance in helping add value to this study.

Sincerely,

David Vieth

IoH Study Group Member
Director, Bureau of Highway Maintenance
Wisconsin Department of Transportation
david.vieth@dot.wi.gov
608-267-8999

Brotheridge, Kenneth - DOT

From: Vieth, David - DOT
Sent: Wednesday, September 18, 2013 11:07 AM
To: DOT IoHStudyFeedback
Subject: FW: Draft IoH Phase II Addendum 09-13-2013

From: Christopher Lindstrom [<mailto:chris@maxvilletruck.com>]
Sent: Monday, September 16, 2013 6:05 AM
To: Vieth, David - DOT
Subject: RE: Draft IoH Phase II Addendum 09-13-2013

David,

I read through the report, and feel confident that we have made a good recommendation!

Chris Lindstrom
Maxville Truck & Repair
Practical Applications
Maxville Trucking LLC
S460 State Road 25
Durand, WI 54736
715-672-7867



From: Vieth, David - DOT [<mailto:David.Vieth@dot.wi.gov>]
Sent: Sunday, September 15, 2013 7:37 PM
To: Vieth, David - DOT
Subject: Draft IoH Phase II Addendum 09-13-2013

Dear Study Group Members and others,

Attached is the draft addendum produced following the discussion held Thursday afternoon, September 12. As we prepare to present this document to Secretary Gottlieb and others, we are offering you an additional opportunity to review the report from that discussion of the group. We welcome any additional thoughts you may have that you feel are important to conveying the sense of the study group. Should you have any questions, you may respond to the IoH mailbox, IoHStudyFeedback@dot.wi.gov, or by replying to me. Please be aware that Ken is out of the office this week, so please respond to the address above or to me at david.vieth@dot.wi.gov.

Your prompt review and response will be appreciated as we have further discussion planned early this coming week.

Thank you again for your involvement and assistance in helping add value to this study.

Sincerely,

David Vieth
IoH Study Group Member
Director, Bureau of Highway Maintenance
Wisconsin Department of Transportation
david.vieth@dot.wi.gov
608-267-8999

Response From	Message	Notes
Chris Lindstrom, Maxville Truck and Repair	I read through the report, and feel confident that we have made a good recommendation!	Followed up with phone call asking we follow through to have recommendations include transport to/from repair facilities, from one farm to another farm, from custom operator to farm
Rick Stadelman, Wisconsin Towns Association	On behalf of Wisconsin Towns Association I want to express our support for the draft Phase II Addendum Report to the Secretary of DOT dated September 15, 2013. Thank you to the entire DOT staff that was involved in this project for all their hard work.	
Brian Dake, Wisconsin Independent Business – Agri-Business Coalition (and Dairy Business Association?)	<p>I believe it accurately reflects the sentiments of the WIB Agri-Business Coalition with respect to the safety contingencies for IoH that extend beyond the centerline and our concerns with the efficacy of the written authorization process for overweight IoH</p> <p>Rec'd prior to revised Sunday version: Pursuant to our conversation, outlined below are additional suggestions for inclusion in the Study Group report and/or items for further discussion by the Study Group.</p> <ol style="list-style-type: none"> 1. create a mechanism whereby the DOT, in consultation with DATCP, can periodically review new and/or converted equipment used by farmers to determine if such equipment is an IoH or IoH CMV; 2. require DOT to establish criteria relating to the operation of "tracked-IoH" on Wisconsin roadways. 3. remove hours of service restrictions for IoH and oversized IoH on municipal and county roadways so as to allow 24/7 use. 4. if necessary, reconcile 2011 Wisconsin Act 58 which authorizes the DOT to issue annual or consecutive month permits allowing vehicles transporting loads of hay or straw to exceed the statutory height limitation of 13.5 feet by up to 1 foot in an urban area, as defined by DOT, or by 1.5 feet elsewhere; 5. require manufacturers and/or dealers of IoH, in consultation with the DOT, to provide farmers with written notice of the 	

	<p>size, gross vehicle weight, axle weight and spacing at the time of sale of new\used loH (unloaded and fully loaded). Furthermore, require manufacturers and/or dealers, in consultation with the DOT, to provide notice to farmers of existing size and weight restrictions and requirements imposed on loH sold in Wisconsin;</p> <p>6. consult with manufacturers\dealers to identify existing loH operating in Wisconsin. In consultation with the DOT, for each loH, the size, gross vehicle weight, axle weight and spacing would be determined (unloaded and loaded). In turn, DOT would be required to make this information available to farmers and develop an outreach plan to farmers.</p> <p>7. Modify existing LRIP\TRIP criteria to grant preference to counties and towns seeking aid to upgrade roads with demonstrated need for the operation of overweight loH;</p> <p>8. Second weight table matrix for Class B Roads (Cooperative Network recommendation)</p> <p>Any questions, please call.</p> <p>Brian Dake Legislative Director WIB – Agri-Business Coalition 608-310-2012</p>	
Kevin Erb, UW-Extension	I have no questions or concerns with the revised report	
Cheryl Skjolaas, UW Center for Agricultural Safety and Health	<p>You may already have seen this information. At end of this powerpoint, it discussed a 2005 WI Assembly bill 340.</p> <p>I was reading the draft and would recommend using lighting and marking not just lighting. Also it's SMV emblem not symbol.</p> <p>I'm still trying to get to ASABE 279.16 which is the current standard.</p>	Her note references pdf attached
Tom Bresner, Wisconsin Agri-Business Association	I got this email from the Wisconsin Corn Growers Association. We didn't talk much about tracks last week. Where do we stand on tracked vehicles?	

	<p>Thanks Tom</p> <p>Spoke with a farmer who attended both Madison and Belmont IOH meetings and wanted an update. He said in Belmont someone asked about tracked vehicles and someone from State Patrol stood up and said that it is illegal to operate ANY tracked vehicle on the road in Wisconsin, they should be trailered and anyone doing so could be stopped and ticketed, because they don't have any axles they are too heavy for roads & bridges. Now anyone who knows anything about tracks understands that the tracks better distribute weight. That is the major benefit for the soil of using tracks.</p> <p>Can you tell me if this is true and if so, what is the task force doing to address tracked tractors, combines and grain carts? Do we need to provide details, documentation on the benefits of tracks?</p> <p>Nancy Kavazanjian Phone: <u>920-887-2471</u> Fax: <u>920-887-2466</u> <u>Nancy@wicornpro.org</u></p>	
Dick Straub, UW Department of Biological Systems Engineering	No response to my knowledge	
UW-TOPS Lab	No response to my knowledge	
Dana Cook, Professional Nutrient Applicators Association of Wisconsin	No response to my knowledge	
Karen Gefvert, Wisconsin Farm Bureau Federation	No response to my knowledge	
Shelly Mayer, Professional Dairy Producers of Wisconsin	No response to my knowledge	
Dan Fedderly, Wisconsin County highway Association	No response to my knowledge	
Dick Strauss, Wisconsin Custom Operators	No response to my knowledge	
Curt Witynski, League of Wisconsin Municipalities	No response to my knowledge	
Walter Groese, Husky Farm Equipment	No response to my knowledge	
Mike Weber, Association of Equipment Manufacturers	No response to my knowledge	
Andrew Mittelstadt, RCI Engineering	No response to my knowledge	

Knowles, Mae - DOT

From: Brotheridge, Kenneth - DOT
Sent: Friday, September 06, 2013 8:46 AM
To: Mulder, Daniel J - DOT; Knowles, Mae - DOT
Subject: FW: Some final comments regarding the final discussion on IOH Study
Attachments: Sec. 66.0628 (4) language on reasonableness of fees.doc; Remarks to IOH Study Group for Town Hall Mtg TOB.pdf

fyi

From: Richard Stadelman [mailto:wtowns1@frontiernet.net]
Sent: Thursday, September 05, 2013 3:05 PM
To: Brotheridge, Kenneth - DOT; Rhinesmith, Rory - DOT; Vieth, David - DOT
Subject: Some final comments regarding the final discussion on IOH Study

Rory, Dave, and Ken,

I appreciate the opportunity to present the towns position at all the town hall meeting on the IOH Study.

I want to list five possible topics for discussion at the final meeting of the IOH study group next Thursday.

(1) The first issue is the apparent disparity in the registration requirements for semi-tractor/trailer manure haulers to the Tractor/Tanker and the CMV Manure Haulers. I have been told that there are 450 semi-tractor/trailer units in the state of members in the Liquid Professional Nutrient Applicators Association (Dana Cook's group). These numbers come from a member who contacted Kevin Erb who works with the association. There are 236 Tractor/Tanker units of the groups members and 150 CMV (straight trucks modified to carry tanks). I do know that the semi-tractors owned by custom haulers are required to be registered with the state at \$2,500 per year registration. I have been told that the Tractor/Tanker Combination does not have to be registered and I believe the CMV straight trucks with tanks are much lower. I believe that we want to encourage the semi-tractor/trailer combinations because they tend to carry the weight best on the highway (five axles at the 80,000 pound limit). {Note one of the question that may need to be clarified are these semi-tractor/trailer combinations going to be eligible for the 15% allowance on unposted roads that other IOH's will be given under our proposal?}

My question is shouldn't the IOH Study group consider trying to make the playing field fairer for the semi-tractor/trailer combinations? Possibly we need to recommend lowering the registration fee for semi-tractors that are just used exclusively for manure hauling? Possibly there should be a fee if there is not one already for the Tractor/Tanker and/or CMV truck with manure tank? My position is to try to encourage the semi-tractor/trailers rather than have a competitive disadvantage for them.

(2) The use of tracked tractors and other tracked self-propelled units on highways. I know that steel tracked units are not allowed on highways, but does the DOT have any insight about the impacts of rubber tracked tractors and self-propelled units on highways? I have heard of some logging equipment with tracks causing damage on local roads in the north, but I don't know if that was steel tracks or not. I also have concerns about tracked vehicles travelling on asphalt in the summer months when the asphalt is softer? Also what about turning issues of tracked tractors?

(3) One county highway commissioner expressed concern to me that if the 15% allowance was allowed on unposted highways that he would consider keeping spring posting limits on longer because of the vulnerability of county highways going from posted to a 15% allowance. His suggestion was to have a two week transition after spring posting before the 15% allowance kicked in. This transition would ensure that the highway was close or at maximum carrying capacity after the spring thaw. There may be an issue of notice to everyone, but possibly a requirement to publish or post notices would need to be added to indicate when spring postings came off in each county and thus when the 15% allowance (presumably two weeks later) went into affect.

(4) Because there has been so much concern about the written annual authorization given by towns and counties being subject to a fee, I wanted to give you some reference to the statutory limitation that fees must "bear a reasonable relationship to the service for which the fee is imposed." That section is Wis. Statutes Sec. 66.0628. In addition the state budget in Act 20 this year also created an appeal procedure to the Wisconsin Tax Appeals Commission to challenge municipal fees that are alleged to be unreasonable. I attached a copy of the new statutory language for Sec. 66.0628 to this email.

I am even willing to suggest putting a statutory cap of no more than \$10 or \$15 per annual authorization if that gives the agricultural community more comfort. This may be viewed as against my interest to have such a statutory cap, but we want communication between the operators and the local government.

From: Bill Berger [<mailto:berger@nelson-tel.net>]
Sent: Wednesday, September 11, 2013 11:37 PM
To: DOT IoHStudyFeedback
Subject: Concerns with IOH Proposals

IoH Study Group,

This is a tough project to tackle but it is needed. Thank you for commitment to this project. However, I was disappointed with the make up of the work group. It appeared to have a disproportionate number of members of agricultural representatives, agricultural manufacturers, custom harvester/manure pit pumpers and very little, if anyone, from the general public as a stake holder.

The concerns I have as a public citizen are as follows:

1) With land use assessment farmers pay very little property tax and that lost revenue was pushed back to the general public and other non land properties to make up the difference in tax revenue. The transportation fund that comes from fuel/gas tax keeps going down so there is less and less money in the fund. This has been spoken publically about by DOT officials as a concern. Farmers currently pay in the area of 25% of the normal registration fee for heavy farm registration plates when compared to other general businesses. 25% of what everyone pays is too much??? Loggers and milk haulers get a special registration fee also for the same amount. Now you want to farmers to self certify and you still are including language of "principally off the roadway" and "designed for agricultural use ." Most of these manure tankers and silage trucks are used more on the road than in the field. I have worked this area and am a farmer myself. I know a farmer that said it took him 20-30 minutes to load a load of manure with a pay loader when it took him about 5 minutes. He spent more time on the road than the load and unload time in the field. That was not his story though. The self certify for a \$12 fee every 10 years is really disappointing. These trucks cause way more damage than most other vehicles and they will not be contributing anything to the road fund. Basically nothing from registration and nothing from fuel tax. This is just not right from a basic common sense standpoint. That is about what I pay to register my atv that I use for ag use on the roadway.

The self certify that it is designed for agricultural use is very vague. Most of these trucks now are a basic truck with a box and hoist. There is nothing designed for agricultural use except for maybe a higher side rack on one side to blow the silage against. Because of this it is going to be exempt from registration because someone put on a side board? How about farmers that are hauling for other farmers? They are paid so much per hour like many dump truck operators who need for hire authority and 4xs the registration fees plus the fuel tax. If it gets to the point of a registration exemption, I think it should be restricted to the farmer who owns the truck, who is hauling his own product, on or between his own farm premises or land which he owns or rents. For hire hauler and custom operations that truck should be switched to a farm plate at best.

2) Custom harvesters and manure tanker trucks run many road miles. These should definitely be treated different than farmers if there will be widespread registration exemptions. The DOT

Brotheridge, Kenneth - DOT

From: Catherine & Doug Wojcik [CDWojcik@ceas.coop]
Sent: Wednesday, September 11, 2013 7:45 AM
To: DOT IoHStudyFeedback
Subject: A few suggestions

Hi

I attended the Stratford meeting and I visited with a couple of the presenters after the meeting. The one suggestion I would like to recommend is that for the permitting process could be done through a website application that would email the application to the proper people for each township, county, and state roads. It would help simplify the process of trying to find all these different officials if you travel through several different townships and counties. Something like a map of the state with the ability to highlight each township, county and state roads as part of our routes. This would really help us those of us with limited time to be able to do this process in a more organized and efficient matter.

Sent from Doug Wojcik's iPhone

Brotheridge, Kenneth - DOT

From: Casey Halopka [hfs.llc@hotmail.com]
Sent: Monday, September 09, 2013 2:41 PM
To: DOT IoHStudyFeedback; Klingenberg, Michael - DOT
Subject: Question regarding IOH Study

We are a small crop farm, but we also go out and haul manure for other farmers. We were looking at this new proposal and we were wondering if you need to have CDL drivers to operate our manure trucks? Also, do we have to have them registered and licensed every year? The trucks are used ONLY for manure hauling. The trucks are only in use 2 times/year as well. Just trying to find out the right way to go about this.

Thank You,
Casey Halopka
715-613-7467

Brotheridge, Kenneth - DOT

From: Cindy Brown [cbrown@cvbean.com]
Sent: Sunday, September 08, 2013 11:04 AM
To: DOT loHStudyFeedback
Subject: Comments after attending the loH town hall meeting in Chippewa Falls
Attachments: image001.jpg

My family, Doane, Ltd., has been farming in Dunn County since 1858. Over the years the farm transitioned from a dairy and live-stock producer to specialty crops. We currently farm 4000 acres in Dunn, Pepin and Eau Claire County, raising dark red kidney beans, corn and potatoes. Our base operation is in the Town of Spring Brook, where we have been very fortunate to have paved roads since the 1960's.

In 1967, our farming operation increased in size to 8 – 30" rows. Our planter and cultivators would have been slightly wider than 17' over 45 years ago. Today we farm 16 – 30" rows and our equipment is 40' wide but folds to a road width of 22'. Our farming season runs from early April through November. The tillage equipment ranges from 15' to 22' wide. The rotary hoes, cultivators, bean windrowers and the corn-head for the self-propelled combine will average about 22' in width. As you can see we exceed the 15' recommendation with the majority of our loH. Our other concern is the weight of Category I T-8 articulated tractors. There are a number of those tractors used by other farmers in our area that may exceed the 15% weight allowances.

We will be burdened with the task of obtaining written authorization so we can exceed the width limits in multiple townships; in our case we may be dealing with up to 6 municipalities. The time necessary to provide a transportation plan including routes, approximating times of travel for multiple pieces of equipment will be onerous. There will be many townships where authorization may not be granted if an anti-farming group serves on the towns board. We also wonder how the township staff will handle the additional administration of the plan along with the compliance that will be required by the state.

The loH that we operate are used in the field 95% of the time. The only reason there is any road time involved is in transit from one field to another. We have a limited window of time to get the crops planted, cultivated, sprayed and harvested. We do have to operate equipment over the weekend and after dark. Though we try to limit the night operation as much as possible, it's not always practical. Our time frame for performing field operations depends on the weather and we are often struggling to get it done.

We are opposed to the width restrictions as presented by the committee and respectively ask that different solutions be found prior to it going to the legislature.

Cindy Brown
President

Cindy Brown



Doane, Ltd.

Chippewa Valley Bean Co.
Menomonie, WI
715-664-8342 Office
715-495-9927 Cell
www.cvbean.com

Brotheridge, Kenneth - DOT

From: Ian Nuhn [ian@nuhn.ca]
Sent: Saturday, September 07, 2013 9:25 AM
To: DOT IoHStudyFeedback
Cc: Kevin A. Erb; nuhnind@nuhn.ca
Subject: Concern with proposed weight restrictions

My name is Ian Nuhn, I am Vice President at Nuhn Industries Ltd., a large manufacturer of liquid manure spreaders, pumps and injection units.

I agree with updating the current definition of IoH to reflect today's agricultural equipment, as well as putting some restrictions on them; however the gross vehicle weight restriction of 92,000lbs is extremely limiting. This limit would make 95% of my customer's equipment obsolete and practically useless.

The proposed legislation is on the proper track with limiting axle weights, as well as considering axle spacing into the equation, however falls short when it restricts the gross vehicle weight at 92,000lbs. If maximum axle weights are determined due to adequate axle spacing, then the elimination of the overall gross vehicle weight would not increase any road damage.

In fact, a weight restriction may even be harder on roads than one without. Because of the nature of my industry, I will use hauling liquid manure as an example. One of our most popular machines can haul 64,000lbs of manure. The gross vehicle weight unloaded is 60,000lbs. Under the current legislation, the 92,000lbs restriction is making my machine make this trip twice. 92,000lbs has to pass over this road twice to the field, and twice empty at 60,000lbs back. Therefore, the road has had a total of 304,000lbs pass over the same spot to complete the task.

If that same machine were allowed to haul a full load, there would only be one trip passing over at a total weight of 124,000lbs, and 60,000lbs back empty. Therefore, to complete the same task, our machine fully loaded has only had 184,000lbs on the same spot on the road, 40% less than two trips. Our machine has a large enough axle spread, and enough axles to be well under the 23,000lbs maximum axle restriction. My conclusion is that the 92,000lbs gross vehicle limit is increasing fuel usage, increasing road damage, as well as drastically reducing efficiencies, adding a huge expense to a farmer's bottom line.

The gross vehicle weight is only a factor when Bridge Laws are taken into consideration. Therefore, it would make more sense to put weight restrictions on individual bridges, not on the roads.

If you have any questions or would like to discuss anything with me, feel free to contact me at any time.

Thanks for providing a way for me to voice my opinion.

Ian Nuhn
Vice President
Nuhn Industries Ltd.

Phone: 519-393-6284
Mobile: 519-639-0235
Email: ian@nuhn.ca
Web: <http://www.nuhn.ca>

Email B

Knowles, Mae - DOT

From: Rhinesmith, Rory - DOT
Sent: Sunday, September 08, 2013 12:35 PM
To: 'John Every'
Cc: Vieth, David - DOT; Brotheridge, Kenneth - DOT; Knowles, Mae - DOT; Mulder, Daniel J - DOT
Subject: RE: fertilizer floaters

Thanks John. We will add this to the comments to be discussed by the Study Group.

Rory L. Rhinesmith, P.E.

DTSD Deputy Administrator - Bureaus
Wisconsin Department of Transportation
4802 Sheboygan Avenue
Madison, WI 53707
Office: 608-266-2392
Cell: 608-235-3016
e-mail: rory.rhinesmith@dot.wi.gov

From: John Every [<mailto:JEvery@vitaplus.com>]
Sent: Friday, September 06, 2013 9:42 AM
To: Rhinesmith, Rory - DOT
Cc: Vieth, David - DOT; Brotheridge, Kenneth - DOT; Knowles, Mae - DOT; Mulder, Daniel J - DOT
Subject: RE: fertilizer floaters

Good morning,

My concerns revolve around the description of a modified CMV in category 3. Both of our fertilizer floaters have a common CMV cab, but the Chassis, suspension, drive system, tires and wheels were all originally engineered for a specific non-highway purpose. They do the same job as many category 2 vehicles, and travel the same road speed, but in fact are lighter, and they meet bridge and gross weight DOT requirements, both loaded and empty. We should be encouraging that design, not discouraging it. The problem comes if they are thrown into category 3, that they are too wide. They would fit perfectly in the width restrictions on category 2.

My question is how do you define a modified CMV. If you look only at the cab, my floaters are modified. If you look at any other part of the vehicle, they are not modified. I feel that you need a description that includes something about the original design of the entire vehicle. Another option might be to consider a speed rating that would move an apparent category 3 vehicle to category 2. Most current category 2 vehicles don't exceed 45 mph, and neither do our floaters.

I would like to make another point. Most pickup crop sprayers are based on Ford F-350 pickups. Those vehicles are marked with a GVW of 11,000 pounds. Once the spray equipment is mounted, empty weight is 9,500, loaded weight is 15,500. In the past most of them have been operated as loH and the GVW considered exempted. Under your new guidelines of 15% overweight, all F350 pickups that are operated with any payload will be illegal. My position has always been, that in the event of a fatal accident involving our vehicles, I wanted to be able to say that we were legal and operating as designed, not to say that we had an exemption. Because of that position we have not used F350's for many years. We have an F550 under our pickup spray unit, which is rated appropriately. In this situation I feel that your proposed guidelines will have an unintended benefit of making our roads safer, but I doubt that anyone running a pickup sprayer caught this detail.

Thanks, John A. Every, General Manager, Vita Plus Loyal and SF Transport LLC.

Brotheridge, Kenneth - DOT

From: Flashinski's Farm Sweet Farm [mhflash@centurytel.net]
Sent: Thursday, September 05, 2013 8:01 PM
To: DOT IoHStudyFeedback
Subject: WisDOT study - Agricultural equipment and vehicles
Attachments: IEEE NESC-2017 proposal_16 ft reference height_ submitted by Flashinski to IEEE on 2013-07-10.pdf

Attached is my NESC Change Proposal # 4469 that is currently under review and comment.

-----Original Message-----

From: Flashinski's Farm Sweet Farm [mailto:mhflash@centurytel.net]
Sent: Thursday, September 05, 2013 12:30 AM
To: 'IoHStudyFeedback@dot.wi.gov'
Subject: WisDOT study - Agricultural equipment and vehicles

Insertions below in color RED text.

-----Original Message-----

From: Flashinski's Farm Sweet Farm [mailto:mhflash@centurytel.net]
Sent: Thursday, September 05, 2013 12:11 AM
To: 'IoHStudyFeedback@dot.wi.gov'
Subject: Agricultural equipment and vehicles

WisDOT,

Regarding your study on **Agricultural equipment and vehicles:**

Today I saw online (http://chippewa.com/news/local/road-rules-farmers-consider-limits-on-equipment/article_bf92c152-14e6-11e3-b79b-001a4bcf887a.html) that WisDOT's proposal is to: *limit the height to 13-feet-six-inches. Any equipment above that height could be used without written authorization from the local government, provided the farmer ensures there are no conflicts with overhead obstructions like wires or structures.*

Other than pinpointing who to blame (for insurance claim purposes), I think this 13.5-foot height proposal may not be effective. It lets the farm implement manufacturer off the hook, and may not eliminate combine harvestors (and cotton pickers) currently measuring 15.67-feet tall in transport mode (even taller with hopper extensions up and carrying a full, heaping load of grain) from snagging overhead wires. The proposal appears to shift the responsibility away from the farm implement manufacturers, away from the equipment dealers, away from the utility companies, and place all burden onto the farmers/operators. And so now the farmers could be 1) out measuring the vertical clearances to lowest wires using their measuring tapes, or 2) calling the utility company on short notice for confirmation of a vertical clearance that changes hour-by-hour with weather conditions (-20F vs 104F) and wire loading (current amps thru-flow). Or even worse, farmers could be 3) completely unaware of the proposed 13.5-foot height limitation and may still snag the overhead wires. That's a dangerous (unsafe) proposal!

I believe that 13.5-feet is the legal height of a semi. I currently work for a utility company and also recognize that the 2012 National Electric Safety Code (NESC) Appendix A uses a 14-foot tall reference vehicle height to determine minimum clearances to ground (under highways and roads). My former job as a structural bridge engineer exposed me to the fact that WisDOT designs new freeway bridges for 16.25 to 16.75-feet of vertical clearance underneath. Equipment manufacturers have caught onto this fact, and their new machines (ex: JD S690 combine harvester or JD cotton stripper) measure 15.67-feet in transport mode. These dimensions are not on John Deere's website - instead available by special request online or local dealer. I have a copy if you would like to preview it.

At the end of the day, WisDOT is trying to penalize the farmer/operator who is not the root cause of this safety problem. Two possible very long-term solutions: 1) farm implement manufacturers must limit the

heights of their new equipment to 13.5-feet tall, or the upcoming 2017 National Electric Safety Code increases its reference height vehicle to 16-feet (or greater) for new designs (existing facilities would be grandfathered until either modified or replaced). In July 2013, I self-submitted NESC Change Proposal # 4469 (to IEEE) that would increase the reference height vehicle from 14-feet to 16-feet tall, basically to acknowledge the increasingly larger farm machinery. Early indications (Aug 2013) from peers is this will not be approved by voting members due to the financial impact on utilities including the communications industry.

During the infinite meantime (short-term), we will all need to continue to live with 15.67-foot tall combine harvesters and lower-hanging (15-ft to 17-ft) distribution neutral and communication wires. I suppose this is where your proposal comes in.

A bandaidd approach to more-quickly address low-hanging wires might be for WisDOT, County, City, and Townships to require all new and existing overhead utility crossing permits to be improved to 16-foot or greater minimum vertical clearance. For example, railroad companies are requiring overhead electrical transmission lines crossings to provide upwards of 32-ft to 35-ft (depending on voltage) minimum vertical clearances above top of tracks. WisDOT could immediately begin to require 18-ft or even 20-ft minimum vertical clearance (and perhaps WisDOT already does?) for all non-energized overhead wire crossings. While this approach would address wire clearances above roads and highways, it would fail to address farm field entrances (for overhead utility wires running parallel to roads, but never crossing them). Those farm field entrances would continue to conform to 2012 NESC minimum clearances.

What does Europe do? I believe they have smaller roads than in the USA, and many of their farm implements bend / fold up more consistenly than our USA implements do. Of course Europe likely has smaller-sized agricultural fields than the USA has.

Why should the farm implement manufacturers be allowed to continue to sell large pieces of equipment that cannot safely travel down our roads? The root cause is not the farmers, it is the manufacturers who are currently designing their implements to fit under bridge overpass heights, while ignoring the 13.5-foot legal heights of semis. A contributing factor is low-hanging wires.

Mark Flashinski
Farm Sweet Farm
Cadott, Wisconsin
www.farmsweetfarm.com
farm: 715-289-4896
cell: 612-437-7223

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NESC© 2017 Edition Revision Process - Change Proposal

Thank you. Your Change Proposal has been sent to IEEE-SA.

The IEEE NESC-2017 proposal_16 ft reference height_ submitted by Flashinski to IEEE on 2013-07-10.pdf has been uploaded successfully.

Your Proposal Number is **CP4469**, Revised Text on Part: 2 Section: 23 Rule: 232 App A, Table 232-3 (Page 295). It will be reviewed at the meeting of the cognizant NESC Technical Subcommittees during the period September-October 2013.

Your Change Proposal, along with a Subcommittee recommendation, will appear in the NESC Preprint for the 2017 Edition, which will be published September 1, 2014.

If you have any questions, please contact Sue Vogel at s.vogel@ieee.org.

You may [go back to the submittal home page](#) to submit another Change Proposal.

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TEMPLATE FOR CHANGE PROPOSALS TO REVISE 2012 NESC®

612-437-7223 cell

Name: Mark Flashinski, PE (Wisc, Mich, Minn) Phone: 715-289-4896 evenings

Company/Affiliation: self-submittal

NESC Rule Number: Rule 232, Appendix A

NESC Page Number: various

Proposed Change

GOAL - To increase the *reference component* for roads, driveways, and cultivated areas from 14 ft to 16 ft to more closely match the published heights of today's agricultural machinery and the vertical clearances provided beneath today's highway bridges.

1) Revise Appendix A Introduction as follows:

- A *reference component* to cover activity in the area to be cleared by the overhead supply and/or communication lines. For example, truck height for over-the-road transport is limited to 4.3 m (14 ft) by state regulation. However, large agricultural machinery that traverses roads, driveways, and cultivated areas can approach 4.9 m (16 ft) unloaded height. Thus the reference component for roads in Table 232-3 is 4.3m (14 ft) 4.9 m (16 ft). Reference components included in the required clearances are shown in Table A-2.

2) Revise Appendix A Table A-2a as follows:

	Table 232-1		Table 232-2	
	Item	Ref (ft)	Item	Ref (ft)
Where wires, conductors, or cables cross over or overhang				
Track rails	1	22.0	-	-
Roads, streets, and other areas subject to truck traffic	2	14.0 <u>16.0</u>	1a	14.0 <u>16.0</u>
Driveways, parking lots, and alleys	3	14.0 <u>16.0</u>	1b	14.0 <u>16.0</u>
Other land traversed by vehicles	4	14.0 <u>16.0</u>	1c	14.0 <u>16.0</u>

3) Revise Rule 232 Table 232-3

Nature of surface underneath lines	(m)	(ft)
a. Track rails of railroads (except electrified railroads using overhead trolley conductors)	6.7	22
b. Streets, alleys, roads, driveways, and parking lots	4.3 <u>4.9</u>	14 <u>16</u>
c. Spaces and ways subject to pedestrians or restricted traffic only	3.0	10
d. Other land, such as cultivated, grazing, forest, or orchard, that is traversed by vehicles	4.3 <u>4.9</u>	14 <u>16</u>

4) Revise Rule 232 Table 232-1 Footnote 25 "When designing a line to accommodate oversized vehicles, these clearance values shall be increased by the difference between the known height of the oversized vehicle and ~~14~~ ft 16 ft."

5) Revise Rule 232 affected Table 232-1 and Tables 232-2 with new heights.

Supporting Comment

MACHINERY FACTS – Based on the attached literature (8 pages) from John Deere, the maximum height of a John Deere model S690 combine harvester is 15'-8" in transport mode (with grain tank covers installed) and 17'-5" in unloading mode. For the Southern folks, the maximum height of a John Deere model 7460 cotton stripper is 15'-8" in transport mode and 23'-0" in unloading mode. It appears farm equipment manufacturers might be self-limiting the maximum heights of their new equipment to be 15'-8" in transport mode, which still allows them to pass under most highway bridges. Please note the attached dimensional information is not readily available on John Deere's website. Instead, it is available through anonymous request submitted through "contact us" feature on John Deere's website, or available through contacting a local implement dealer. I submitted a similar request for dimensions to Case IH, but never received a reply.

PASSIVE APPROACH – The 2012 NESC Section 232 Table 232-1 Footnote 25 attempts to address this known reference component height issue (for oversized vehicles taller than 14-feet) by placing the responsibility on the Designer / Engineer.

BIG RISK - The Designer / Engineer can be fully aware of Section 232 Table 232-1 Footnote 25, but may not have a general awareness of today's increasingly larger agricultural machinery; thus failing to perform the required extra research (ex: proactively contacting John Deere, Case IH, etc.) to determine the maximum heights of agricultural machinery that may be used. Even if the Designer / Engineer has an agricultural background and/or is knowledgeable of today's machinery maximum heights, they could make general assumptions that NESC already addresses this machinery (ex: typically agricultural equipment is exempt from oversized vehicle highway permits in rural areas) or that machinery of this size will never be used under their overhead electric line; therefore excluding the oversized heights (per Footnote 25) from their final design. These

oversights would result in less than desirable vertical clearance to ground, increasing the potential for contacts between energized open supply conductor and agricultural machinery or machinery operators, causing equipment damage, operator injury, or death.

PERSONAL BACKGROUND - I am familiar with this known reference component height issue since my current job as a Transmission Line Engineer requires knowledge of 2012 NESC, and my extended family owns large combines. The machine sheds used to store these combines typically have 18 ft tall sidewalls. I have stood on the top of a Case IH model 8230 combine harvester and would estimate my head and shoulders to be approximately 18 ft to 20 ft above ground line. I would hope that no farmer / operator would ever climb to the top of these combine harvesters when parked under / near an overhead electrical power line that runs parallel to or diagonal across a cultivated area.

BUFFERS - Some utility companies are already designing for buffers above NESC minimum clearances. If 2017 NESC adopts a reference component of 16 ft, the resulting 2 ft increase (versus 14 ft) may not cause noticeable changes in new pole heights, project costs, etc.

GRANDFATHERED - Existing lines would be grandfathered under 2012 NESC Part 0, Section 01, Rule 013B.

NERC STANDARD FAC-008 FACILITY RATINGS ALERT - Many utility companies are currently reviewing their 100kV and up electric transmission lines for compliance with NESC minimum clearances. Once 2017 NESC becomes law, this line rating review effort may be over. However, the utility company should have recent survey data that could help them design for the 2017 NESC minimum clearances for any maintenance projects.

ROADS AND BRIDGES - The Wisconsin DOT's Bridge Manual requires all interstate highway and state trunk highway bridges be designed for 16'-3" to 16'-9" minimum vertical clearance. The Wisconsin Manual On Uniform Traffic Control Devices (MUTCD) requires Low Clearance signs be installed when that measured clearance is 14'-6" or less.

SNOWPLOWING OPERATIONS - County highway and Township road snowplow drivers who are accustomed to lifting their dump truck's boxes to be no taller than 16'-3" to 16'-9" above top of road (to pass under bridges of known heights) currently need to worry about lowering their dump boxes to avoid snagging low electrical utility wires (ex: distribution neutral) that 2012 NESC allows to be less than 16-feet above top of road.

ACTIVE APPROACH - I believe the 2017 NESC should take a more aggressive (active) approach by acknowledging the maximum heights of today's increasingly larger agricultural machinery. NESC should not place so much responsibility with the Designer / Engineer to identify oversized vehicles, especially when today's agricultural machinery heights are known to be 15'-8" or taller (see attached literature), new highway bridges are already being designed for up to 16'-9" of vertical clearance, and snowplow drivers have been known to snag utility wires that are lower than 16'-0" above top of road.

Flashinski, Mark P

From: Mark Flashinski [mflashy@hotmail.com]
Sent: Wednesday, January 23, 2013 11:07 PM
To: Flashinski, Mark P
Subject: FW: JohnDeere.com General Feedback [Incident: 130118-000004]
Attachments: s680_s690_dimensions.pdf; 7460_cottonstripper_dimensions_final.xls

From: jdagccc@mailnj.custhelp.com
To: mflashy@hotmail.com
Date: Wed, 23 Jan 2013 10:29:38 -0500
Subject: JohnDeere.com General Feedback [Incident: 130118-000004]

Recently you submitted a question to our online support center. Below is a summary of your question and our response.

To update this question by email, please reply to this message or [click here](#) to access your question from our support site.

Thank you for allowing us to be of service to you.

Subject

JohnDeere.com General Feedback

Discussion Thread**Response Via Email (Lisa S.)**

01/23/

Dear Mark Flashing, Thank you for your inquiry and interest in John Deere.

I have included the dimensions of our combines and cotton strippers. I believe these wo tallest products that we make.

I think the information you are looking for should be contained in the attachments.

Thank you,
Lisa S.
John Deere Customer Contact Center
Ag Products
USA/Canada

Customer By Email (Ag - Forwarded Customer)

01/18/

From: Customer Request
Sent: Friday, January 18, 2013 3:10:12 PM
To: JDCCCAg
Subject: FW: JohnDeere.com General Feedback
Auto forwarded by a Rule

1/30/2013

-----Original Message-----

From: AnonymousWebForm@anonymous.deere.com
[mailto:AnonymousWebForm@anonymous.deere.com]

Sent: Thursday, January 17, 2013 9:10 PM

To: Customer Request

Subject: JohnDeere.com General Feedback

***** This email message was generated by UFO form number: 5501. *****

First Name : mark

Last Name : flashinski

Address : 16294 250th street

City : cadott

State/Province : wi

Zip/Postal Code : 54727

Phone : 612-437-7223

Email : mflashy@hotmail.com

Comments : I work for a utility company. I am researching the maximum (loaded) height of your combines. Your website's online brochure does not list heights.

http://www.deere.com/en_US/docs/zmags/agriculture/online_brochures/grain_harvesting/s_series.html

Can you provide maximum heights of your S690, or tallest combine available? Also, what adder height should I include for aftermarket flip-up hopper extensions? And with these extensions, what adder height should I include for heaped (wet) corn?

Is the combine your tallest piece of machinery?

2012 NESC uses a 14-foot tall reference vehicle (ex: semi) for determining minimum electrical clearances from roads, parking lots, agricultural fields to lowest energized wires. I am thinking your combines can be taller than that.

Efforts to write the 2017 NESC are underway. Once your combine maximum heights are known, I can present this data to the committee that has authority to re-write the code to acknowledge today's increasingly taller machinery.

PS - my 4yr old loves your green die-cast toys!

[----001:002152:16279----]

Dimensions (Grain Tank Extensions)

NOTE: Dimensions are approximate and subject to change without notice.

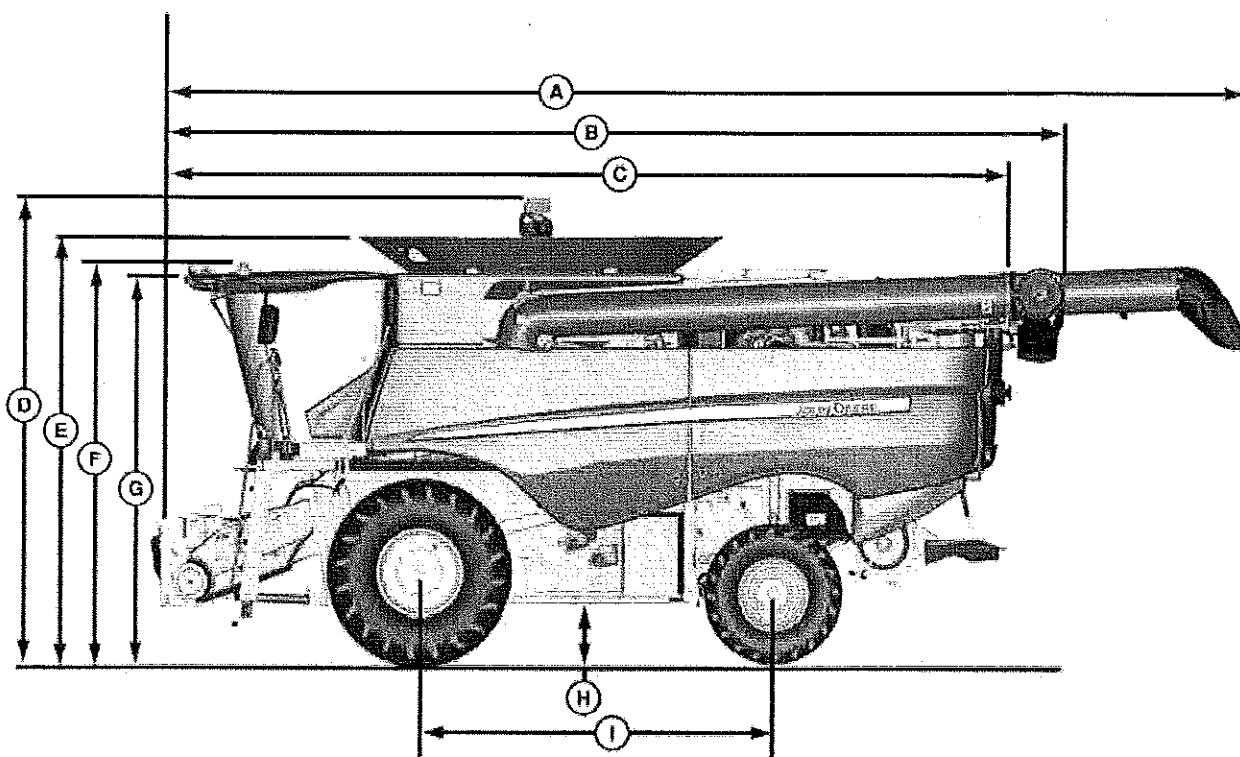
Dimension	900/65R32 Front Tires 620/75R26 Rear Tires 6.9 m (22 ft. 5 in.) Standard Unloading Auger	900/65R32 Front Tires 620/75R26 Rear Tires 6.9 m (22 ft. 5 in.) Power Fold Auger	900/65R32 Front Tires 620/75R26 Rear Tires 7.9 m (26 ft. 0 in.) Unloading Auger
A	10.97 m (35 ft. 10 in.)	10.97 m (35 ft. 10 in.)	12.08 m (39 ft. 6 in.)
B	Not applicable	9.09 m (29 ft. 8 in.)	Not applicable
C	8.48 m (27 ft. 8 in.)	8.48 m (27 ft. 8 in.)	8.48 m (27 ft. 8 in.)
D	4.66 m (15 ft 3 in.)	4.66 m (15 ft 3 in.)	4.66 m (15 ft 3 in.)
E	4.47 m (14 ft. 6 in.) 14,096 L (400 bu.) Extension	4.47 m (14 ft. 6 in.) 14,096 L (400 bu.) Extension	4.47 m (14 ft. 6 in.) 14,096 L (400 bu.) Extension
F	3.88 m (12 ft. 7 in.)	3.88 m (12 ft. 7 in.)	3.88 m (12 ft. 7 in.)
G	3.82 m (12ft. 5 in.)	3.82 m (12ft. 5 in.)	3.82 m (12ft. 5 in.)
H	0.49 m (1 ft. 6 in.)	0.49 m (1 ft. 6 in.)	0.49 m (1 ft. 6 in.)
I	3.53 m (11 ft. 6 in.)	3.53 m (11 ft. 6 in.)	3.53 m (11 ft. 6 in.)
J	7.65 m (25 ft. 1 in.)	7.65 m (25 ft. 1 in.)	8.70 m (28 ft. 5 in.)
K	5.11 m (16 ft. 7 in.)	5.11 m (16 ft. 7 in.)	5.36 m (17 ft. 5 in.)
L	4.40 m (14 ft. 4 in.)	4.40 m (14 ft. 4 in.)	4.65 m (15 ft. 2 in.)
M ^a	4.46 m (14 ft. 6 in.)	4.46 m (14 ft. 6 in.)	4.71 m (15 ft. 4 in.)
N ^b	3.72 m (12 ft. 2 in.) Rear Tires		
O ^b	3.91 m (12 ft. 8 in.) Front Tires		
<div>• For 520/85R42 R1 Duals, subtract 13 mm (0.5 in.)</div> <div>• For 650/85R32 R1W Duals, add 18 mm (0.7 in.)</div> <div>• For 76X50-32 16PR HF3, add 3 mm (0.1 in.)</div> <div>• For 800/70R38 R1W, add 3 mm (0.1 in.)</div> <div>• For 900/60R32 R1W, subtract 29 mm (1.1 in.)</div> <div>• For 1050/50R32 HF3, subtract 61 mm (2.4 in.)</div>			

^aDimension is measured 1.22 m (4 ft.) from the grain spill point. This represents the unloading auger when centered over the grain cart.

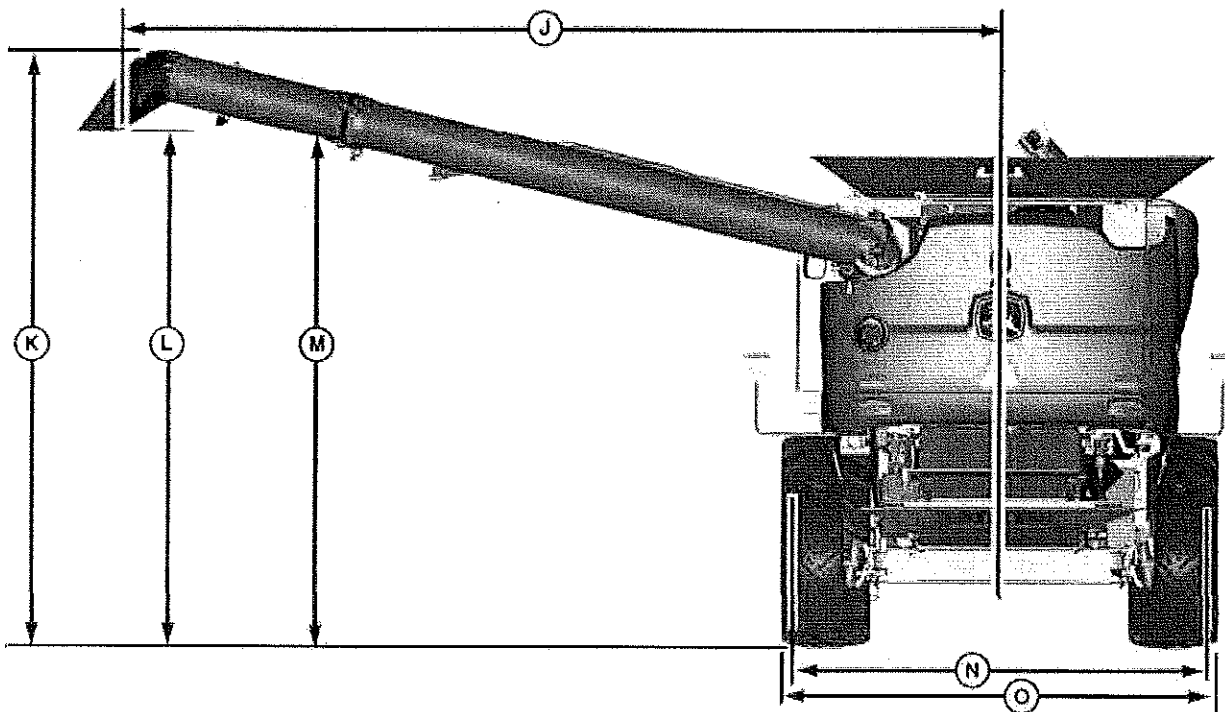
^bDue to different tire configurations, row spacings, axle configurations, wheel offsets, axle positions and spindles types, machine widths will vary. Measurements given in chart are for minimum and maximum widths. For more detailed width information, see your John Deere dealer.

QUO6075,0000BAC -19-11APR11-1/1

Dimension Reference Points (Grain Tank Extensions)



H97226 — UN — 06DEC10



H97227 — UN — 13JUL10

OUC6075,0000870 - 19-07JUL 10-1/1

Dimensions (Grain Tank Covers)

NOTE: Dimensions are approximate and subject to change without notice.

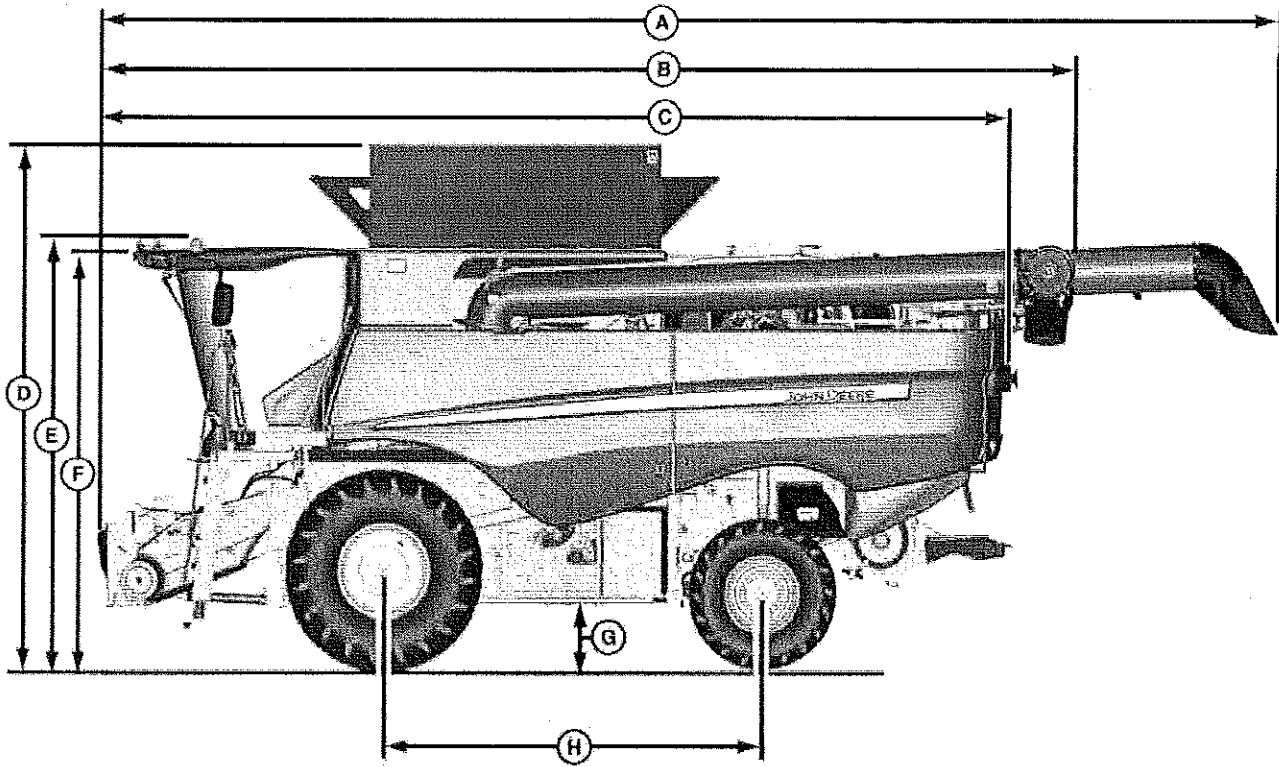
Dimension	900/65R32 Front Tires 620/75R26 Rear Tires 6.9 m (22 ft. 5 in.) Standard Unloading Auger	900/65R32 Front Tires 620/75R26 Rear Tires 6.9 m (22 ft. 5 in.) Power Fold Auger	900/65R32 Front Tires 620/75R26 Rear Tires 7.9 m (26 ft. 0 in.) Unloading Auger
A	10.97 m (35 ft. 10 in.)	10.97 m (35 ft. 10 in.)	12.08 m (39 ft. 6 in.)
B	Not applicable	9.09 m (29 ft. 8 in.)	Not applicable
C	8.48 m (27 ft. 8 in.)	8.48 m (27 ft. 8 in.)	8.48 m (27 ft. 8 in.)
D	4.83 m (15 ft. 8 in.) 14,096 L (400 bu.) Covers	4.83 m (15 ft. 8 in.) 14,096 L (400 bu.) Covers	4.83 m (15 ft. 8 in.) 14,096 L (400 bu.) Covers
E	3.88 m (12 ft. 7 in.)	3.88 m (12 ft. 7 in.)	3.88 m (12 ft. 7 in.)
F	3.82 m (12 ft. 5 in.)	3.82 m (12 ft. 5 in.)	3.82 m (12 ft. 5 in.)
G	0.49 m (1 ft. 6 in.)	0.49 m (1 ft. 6 in.)	0.49 m (1 ft. 6 in.)
H	3.53 m (11 ft. 6 in.)	3.53 m (11 ft. 6 in.)	3.53 m (11 ft. 6 in.)
I	7.65 m (25 ft. 1 in.)	7.65 m (25 ft. 1 in.)	8.70 m (28 ft. 5 in.)
J	5.11 m (16 ft. 7 in.)	5.11 m (16 ft. 7 in.)	5.36 m (17 ft. 5 in.)
K	4.40 m (14 ft. 4 in.)	4.40 m (14 ft. 4 in.)	4.65 m (15 ft. 2 in.)
L ^a	4.46 m (14 ft. 6 in.)	4.46 m (14 ft. 6 in.)	4.71 m (15 ft. 4 in.)
M ^b	3.72 m (12 ft. 2 in.) Rear Tires		
N ^b	3.91 m (12 ft. 8 in.) Front Tires		
• For 520/85R42 R1 Duals, subtract 13 mm (0.5 in.) • For 650/85R32 R1W Duals, add 18 mm (0.7 in.) • For 76X50-32 16PR HF3, add 3 mm (0.1 in.)		• For 800/70R38 R1W, add 3 mm (0.1 in.) • For 900/60R38 R1W, add 34 mm (1.3 in.) • For 1050/50R32 HF3, subtract 61 mm (2.4 in.)	

^aDimension is measured 1.22 m (4 ft.) from the grain spill point. This represents the unloading auger when centered over the grain cart.

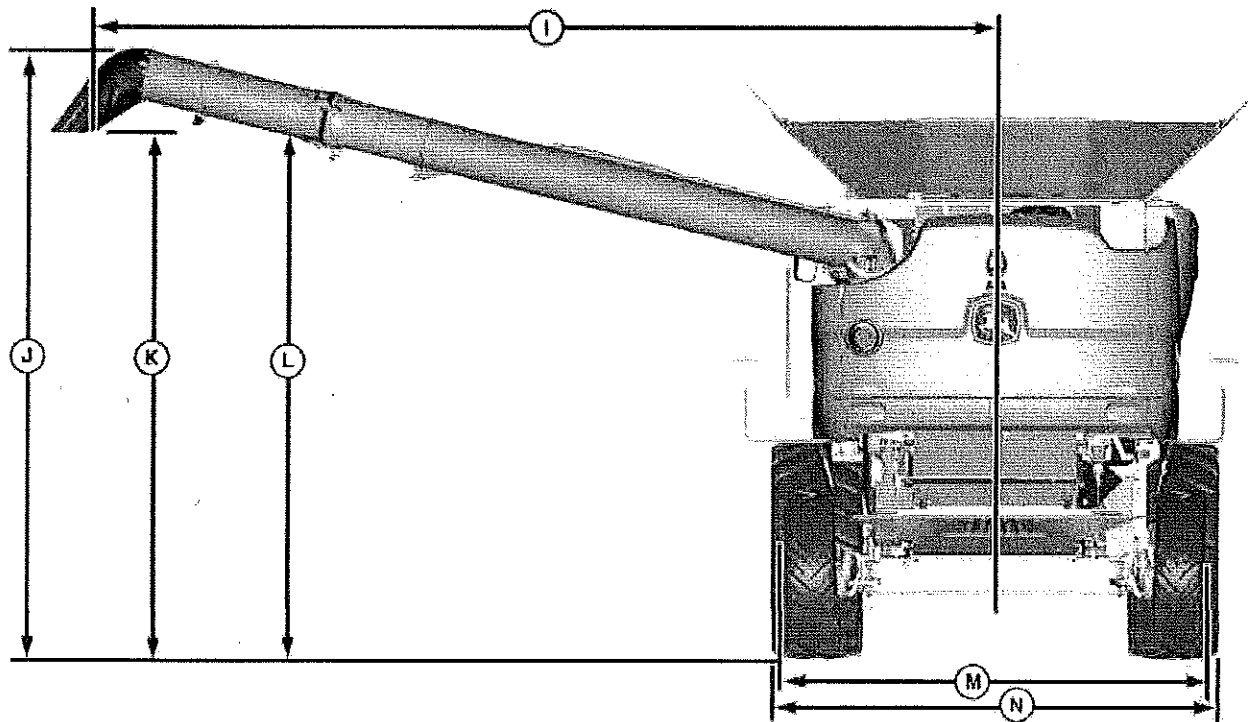
^bDue to different tire configurations, row spacings, axle configurations, wheel offsets, axle positions and spindles types, machine widths will vary. Measurements given in chart are for minimum and maximum widths. For more detailed width information, see your John Deere dealer.

OU06075,0000BAD -19-29JUN11-1/1

Dimension Reference Points (Grain Tank Covers)



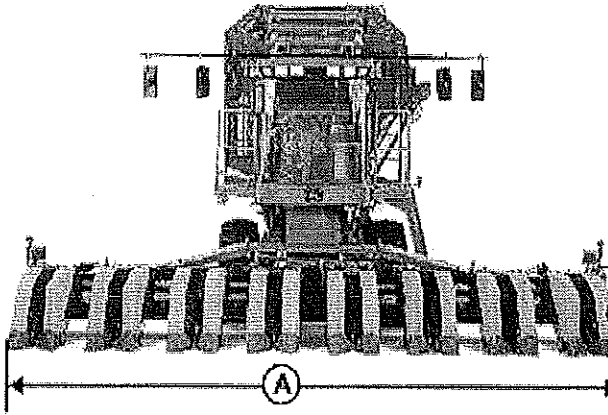
H97228 —UN—28JUN11



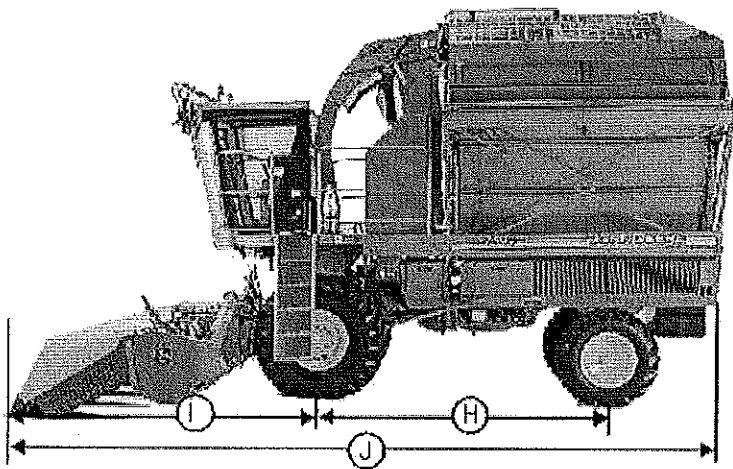
H97229 —UN—13JUL10

OU06075,000088E -19-05JAN11-1/1

JOHN DEERE 7460 COTTON STRIPPER DIMENSIONS

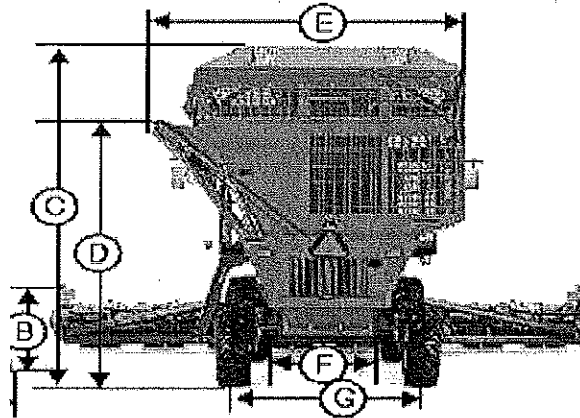


(A)	Header width with 40-in. (1016 mm) row spacings:
	8-row 315.6-in. (8016 mm)
	6-row 235.2-in. (5974 mm)
	4-row 154.8-in. (3932 mm)



(H)	135.25-in. (3435 mm)
(I)	134.5-in. (3417 mm) units lowered
(J)	310.5-in. (7888 mm) units lowered

JOHN DEERE 7460 COTTON STRIPPER DIMENSIONS



(B)	Unit height 34-in. (864 mm)
(C)	188-in. (4775 mm); dump height, 276-in. (7010 mm)
(D)	137-in. (3480 mm)
(E)	Basket-to-rockshaft width 134-in. (3404 mm)
(F)	Drive wheel (center-to-center) 67-in. (1702 mm) 13.1-6 tire
(G)	Guide wheel 85-in. (2159 mm) centerline to centerline of drive tires

Brotheridge, Kenneth - DOT

From: Steinacker Farms Inc. [steinackerfarms@aol.com]
Sent: Thursday, September 05, 2013 3:35 PM
To: DOT IoHStudyFeedback
Subject: IoH study.

To whom it may concern,

I am sure you have all done your study well but you have missed one very important part of the study. Actually going to the farms in Wisconsin during planting and harvest to see how things operate. It is a very short period of time in which farmers are on the road with bigger equipment. (Field cultivators, planters, drills, combines and deep tillage tools)

Here on our farm we try very hard to move from field to field when traffic is at the slowest times, because we are located not too far west of Appleton. We try to stay out of the people's way, but everyone is in a hurry and doesn't want to wait for anything.

Some roads need to be fixed just because they are old, yes old, and have had so many dump trucks running over them to **construct housing**. The construction of houses runs all year long. In the spring when weight limits are on does the construction world shut down????

I know there are some big dairies or custom guys who run a lot through out the summer, but not everyone is doing that. If that is the major issue then take action with them, not the entire ag world. For example if someone is emptying their pit, they have to get a permit for the township they are traveling through, or so much for a 2 mile radius and so much for a 5 mile radius. You could put weight limits on the tankers, and have permits bought for heavier loads, just like semi haulers do.

As far as width and height go. The farmers are going to buy the equipment that works best for them. Manufacturers of the equipment are not going to change their designs for us. Most wires are being moved underground and or should be high enough for most all equipment if they are maintained. Traveling on the side of the road should not be a huge deal, you slow down when traveling there as to not tip over.

Other persons on the road. There is not a person in this world that will ever fix that problem. There will always be the teenage who has to go 75, the mom or dad who is late to pick up her kids, people who are texting, and just plain dumb who don't want to think they have to slow down for anyone. When you fix that, there will be less accidents on the road ways all around.

Back to farming, we also have to deal with mother nature and move as quickly as possible to get the job done. Loading and unloading equipment takes time and where do you think the equipment will be loaded and unloaded. It will be on the road, causing more back ups and conflict with drivers. The less time we as farmers have to be on the road the happier we are. Time and efficiency is a huge part of what lets us farmers supply food to the country. I know everyone of us would like a little more respect when we are out there on the road, we are not trying to get in anyone's way (like road construction guys) we are just trying to do our jobs.

Having driver lic and CDLs, I believe is very important. Anyone on the road should hold the proper license.

Thanks for listening.

Michelle Sargent

Steinacker Farms Inc.

steinackerfarms@aol.com

Office: 920-757-6096

Fax: 920-757-5623

Brotheridge, Kenneth - DOT

From: Dave Lambert [dlambert@co.grant.wi.gov]
Sent: Thursday, September 05, 2013 10:16 AM
To: DOT IoHStudyFeedback
Subject: Comments from Belmont IoH Impact Study Meeting

Hello I attended the above noted meeting in Belmont, last evening and have the following comments.

1.) A driver should be at least 16 years old and possess a valid drivers license if he wants to operate an IoH Vehicle. Operators of automobiles need to meet this requirement, all drivers using the public road system should also meet this requirement. Rory did a wonderful job of responding to the comment about an operator who had a few drivers working for him that had lost their driver's licenses.

2.) An operator of an overweight vehicle needs to contact every Town/Village/County/City that has jurisdiction over a road that he wants to travel on. I don't like the idea of going to a central permitting authority. If the operator does not like this, he can choose to reduce the number of municipalities he operates in.

3.) Maybe an operator can safely drive a 17.5-ft wide combine down a curve, 22-foot wide county or town highway, however, I don't want to be the man in court when a driver is injured after running into a wide farm implement where I approved the permit for that implement to travel on the road. Will there be any liability protection for public officials that will be asked to approve these permits?

Good meeting, tough questions.

Sincerely,

Dave Lambert - Grant County Highway Department

Brotheridge, Kenneth - DOT

From: Kevin and Nicole Fischer [knfish@live.com]
Sent: Thursday, September 05, 2013 5:21 AM
To: DOT loHStudyFeedback
Subject: ioh comments

To whom it may concern,

My name is Kevin Fischer, and I am A supervisor in the town of Brillion in Calumet county. I attended the meeting in Green Bay and I would like to submit a few comments. I work for a company that sells and services farm equipment and I work on farms part time. It seems to me that some of these farmers and custom operators think that they are to big or good to have to obey some new changes, so I hope the state government sets new fair rules in place and gives us the tools to enforce them. I think the 17 or 18 foot width is a little much, if a commercial company needs to haul something over that is over 8foot 6they need a permit and the farmers can almost whatever the want. either this farm equipment needs to be set up with better lights or some kind of marking or the equipment need to be pulled down the road in a narrower way like taking the head off of any combine or swatter. In regard to the weight this is where I think it needs to stay at 80,000 because most people go over and if you give them more they will go over that and we cannot get enough enforcement out there to make a difference. I also think that there needs to be some kind of registration fee or tax on some of this fuel for any motorized vehicle that goes down the road to help pay for the road repairs, with a portion of this money going right to the county and local governments. Also it would be nice if the county police could do more enforcement of the weight and with issues. The state could pass laws to make farmers put in at least 40 wide culverts to these fields and let them directional bore under county and state roads to get manure to more places without the use of motorized vehicles. Thank you for your time Kevin Fischer 1-920-213-4889

Email

Knowles, Mae - DOT

From: Rhinesmith, Rory - DOT
Sent: Thursday, September 05, 2013 1:51 PM
To: Brotheridge, Kenneth - DOT; Knowles, Mae - DOT; Vieth, David - DOT; Mulder, Daniel J - DOT
Subject: FW: IOH Town Hall

Ken – Please add to the comments we have received.

Rory L. Rhinesmith, P.E.

DTSD Deputy Administrator - Bureaus
Wisconsin Department of Transportation
4802 Sheboygan Avenue
Madison, WI 53707
Office: 608-266-2392
Cell: 608-235-3016
e-mail: rory.rhinesmith@dot.wi.gov

From: Rep.Ripp [<mailto:Rep.Ripp@legis.wisconsin.gov>]
Sent: Thursday, September 05, 2013 12:05 PM
To: Rhinesmith, Rory - DOT
Subject: FW: IOH Town Hall

Another email for feedback. Please pass on. Thanks.

From: Andrew Herro [<mailto:fvdairy@gmail.com>]
Sent: Monday, September 02, 2013 3:27 PM
To: Rep.Ripp
Subject: IOH Town Hall

FV Dairy LLC

E8698 Reinke Rd.
Clintonville, WI 54929

September 2, 2013

Representative Keith Ripp
Room 223 North

State Capitol
P.O. Box 8953
Madison, WI 53708

Dear Representative Ripp:

I recently attended an IOH town hall meeting in Green Bay and I am writing to you to voice my concerns with the proposed legislation recommendations. Let me begin by introducing myself. My name is Andy Herro. I am a Marquette University graduate, father of three, first generation dairy farmer with my in-laws, and the Vice Chair of the Waupaca County Republican Party. I have a very diverse background and a great interest in the future of our state and our country.

The situation which we are coming to confront is not easy to resolve, and yet there are those of us who choose to take on this burden. We live in an era of increasing prosperity and opportunity but are often also faced with the challenge of burdensome rules and regulations. Perhaps even worse than the rules and regulations are the nature in which they are enforced or ignored. It appears to me that there are often so many rules, that it is impossible, even for law enforcement, to understand and be able to apply them all.

Agriculture is an extremely innovative and complex industry. If I could spend all my days concerning myself with the health of my animals, the fertility of my soils and the function of my equipment, I would be a happy man. But many of my days are filled with reading through statute, applying for permits and licenses, and keeping my paperwork straight in case the DNR, EPA, OSHA or any other government, tax payer funded, regulatory agency should come calling. If money were no issue, I'm sure I could hire five new staff members to make sure that we are, at all times, "in compliance."

As farmers, we do our best to "make do" with what equipment we have, do repairs in house, make a piece of machinery last just one more year, and occasionally have the opportunity to upgrade to a new used piece of equipment to make our lives easier, our work more efficient and spend less on fuel and repairs. Often times, a farmer can increase his production with a larger planter, larger tillage equipment or a bigger manure tanker. Perhaps these items will allow them to have another hour at home with their family or be able to produce more for our society.

Farmers feed this world. You do not see gardens in every person's back yard so that they may feed themselves. They do not need to. They are fortunate enough to have low cost, high quality food available in what appear to be unlimited quantities, thanks to farmers. Many people are able to enjoy their nights and weekends off and take long holidays because they do not have to tend to crops or livestock. Farmers create a simple product that is essential for human life on this planet to survive.

Let us now face the challenge that is laid before us. Besides enjoying plentiful food sources, clean water and comfortable housing, we are also blessed with an efficient system of roadways. These roadways allow us to safely travel, go long distances with ease and provide a comfortable ride. All of these are very important factors and yet, in this complex situation, I ask you to consider what action can result in the greatest benefit for us, our state, our country, our environment and our world?

The most obvious commodity that the agricultural community provides is food. This food feeds our friends, family, citizens of our country and, in our global economy, the people of the world. The number of acres used for farming in Wisconsin has decreased nearly 50% in the last hundred years, and yet, the population of our world continues to increase exponentially. We have to plant more crops on fewer acres, produce more milk and meat with less feed and do everything in our power to create the food necessary to meet the demands of our world. This requires more innovation, better ideas, and, perhaps, bigger equipment. If we limit the size of the equipment that we are allowed to operate then we limit our ability to increase our production to serve one of the most basic human needs.

The next service that farmers provide is to be the stewards of our land. We cannot produce healthy, hearty crops unless our soils are fertile and well maintained. We need to do everything in our power to make certain that our fields are fertile by using the organic waste matter from our animals as a supplement. We do our best not to use chemical fertilizer or other harsh chemicals on our fields so that we ensure our soils will be

healthy and productive. Farmers follow strict guidelines to prevent any waste or runoff from entering into the waterways and protected ecosystems.

Finally, we use equipment that will make our work efficient and highly productive. Though our equipment is larger, we are able to get the work done more quickly, ensuring that we are on the roadways less and that we have a reduced carbon footprint. In our current day and age, one tractor can do the work that would have taken ten tractors to do in years past. This saves us time and burns less fuel.

For the past 100 years the amount of tillable acres has been decreasing. For the past 100 years, farm equipment has been growing in size to meet the demands of the industry and assist in the productivity of the farmer. For however long the state statutes have been in place, the weight and size limitations put upon farm equipment have not been enforced. Perhaps it was because the implements are different or hard to weigh, but these factors should have been considered when the law was made. An unenforceable law is oppressive to the law enforcement who cannot enforce it and the citizen who must worry about if and how the law will ever be used. We are offered a "solution" in which we can operate a piece of farm machinery no heavier than 93,000 pounds and less than 17' wide as a compromise. This is no favor to us when we have equipment that has been operated for years that are already above and beyond these recommendations. We are given some option to ask permission from each and every city, municipality and township if it is acceptable for us to pass through it's boundaries. This gives me little comfort knowing that I will have another permission that I must ask and another group of individuals which I must entrust to grant me my livelihood. If these recommendations are passed through some legislation, then they will surely put farmers out of business, they will surely do harm to those who try to comply by forcing us to use our equipment below it's capability or have no other choice but to sell it. This will surely add another level of regulatory burden to our already overfilled plates.

I appreciate the fact the folks like to drive their Buicks down newly paved, smooth roads in comfort. I appreciate that roads look nice and are well groomed. It is pleasant that folks can drive their cars at great speeds above the speed limit. But I ask you, if we create these new regulations on farmers who will benefit more? Will we have more food for the world? Will we have more productive land? Will we have more jobs in our local economy? What use are roads if we have no food? What use are roads if we have no land to get to? What use are roads if we have no jobs? Which course of action provides a greater benefit to our families, our society, our land, our country, our world and our well being?

I ask you, Representative Ripp, to help Wisconsin farmers and the agricultural community remain strong. Do not put us out of business by making obsolete our efficient, systems of production. Do not force us to accept a compromise that will serve to harm our industry and our families. I thank you for your time.

Sincerely,

Andy Herro
General Manager
414-418-4014

Brotheridge, Kenneth - DOT

From: Matthew Digman [matthew.digman@gmail.com]
Sent: Saturday, August 31, 2013 11:06 PM
To: DOT IoHStudyFeedback
Subject: Road Safety

If safety is of concern, please consider including braking requirements in this legislation. Farm equipment is heavier, wider and faster than ever. - Matthew

[http://elibrary.asabe.org/abstract.asp?search=1&JID=2&AID=40597&CID=s2000&T=2&urlRedirect=\[anywhere=on&keyword=&abstract=&title=&author=&references=&docnumber=&journals=s&searchstring=&pg=&allwords=braking&exactphrase=&OneWord=&Action=Go&Post=Y&qu=\]&redirType=newresults.asp](http://elibrary.asabe.org/abstract.asp?search=1&JID=2&AID=40597&CID=s2000&T=2&urlRedirect=[anywhere=on&keyword=&abstract=&title=&author=&references=&docnumber=&journals=s&searchstring=&pg=&allwords=braking&exactphrase=&OneWord=&Action=Go&Post=Y&qu=]&redirType=newresults.asp)

Braking System Test Procedures and Braking Performance Criteria for Agricultural Field Equipment

Published by the American Society of Agricultural and Biological Engineers, St. Joseph, Michigan www.asabe.org
ASAE ANSI/ASAE S365.9 November 2011

Keywords: Brake, Definitions, Implements, Safety, Test, Tractor, Trailers

1 Purpose

1.1 The purpose of this Standard is to establish requirements, minimum performance criteria, and performance test procedures for braking systems on agricultural field equipment.

Note: If a section of this standard provides details on a specific type of braking system, other braking systems can be used as long as they comply with the performance requirements of this standard.

Brotheridge, Kenneth - DOT

From: MartiMWT [marti@mwt.net]
Sent: Friday, August 30, 2013 2:49 PM
To: DOT IoHStudyFeedback
Subject: information

I was unable to go to the Cashton meeting. Could you tell me some of the recommendations that you are working on? We have one large dairy with IoH that uses our town roads. What options do we have? We have damage especially in the heat of the summer. So far, no bridges are of a concern, but that may change.

Marti Graham
Union Township
Vernon County

August 29, 2013

Rory Rhinesmith
Deputy Administrator,
WisDOT
IoHStudyFeedback@dot.wi.gov

To Whom It May Concern:

I have read the 2013 Spreading Log publication discussing the redefining of "Implements of Husbandry" and the accompanying weight & height issues. It is the height requirement issue I would like to address.

The National Electric Code states that all electric wires must be a minimum of 18' above any public road. At this time, the State of Illinois, my home state, does not require a route survey for machines less than 16' high. Each state has its own height requirements for its definition of implements of husbandry.

As the farming industry continues to evolve, 60' swath tillage machines are becoming popular. These machines are usually 15' – 16' high. As drag hose bars become wider, a 13'6" maximum height limit will be a serious problem.

With all the adversity the US farmer faces and the need to compete with foreign countries like South America, it would seem that a nationally recognized height allowance would eliminate at least one of the difficult issues for our farmers.

I would respectfully suggest that Wisconsin not approve a height allowance of less than 16' for implements of husbandry. With the 18' minimum National Electric Code, having an implement of husbandry limit of 16' high would not be a problem.

Sincerely,

Bill Dietrich

401 State Rt 117
Goodfield, IL 61742
309-965-5110

Brotheridge, Kenneth - DOT

From: James Taylor [jtaylor@hillsboroequipment.com]
Sent: Thursday, August 29, 2013 8:43 AM
To: DOT loHStudyFeedback
Subject: Cashton meeting follow up
Attachments: JohnDeereLogo.gif; stihl_logo_top.gif; Annual Oversize permit dimensions.xls

We purchase annual oversize permits in several states and in several states where we operate there are no requirements for oversize permits. In other states we purchase trip permits. As you can see from the attached file there is no uniformity in the size thresholds state-to-state. The thresholds you have proposed are generous. Uniformity in, at least, the upper Midwest would be welcomed.

Thank you.

James L. Taylor VP/GM

Hillsboro Equip., Mauston Equip., Slama's Lawn & Sport

Phone 608-489-2275, 608-847-2020, 608-524-0788



JOHN DEERE

STIHL

www.hillsboroequipment.com

www.hillsboroequipment.net

ANNUAL OVERSIZE PERMITS DIMENSIONS

<u>STATE</u>	<u>WIDTH</u>	<u>HEIGHT</u>	<u>LENGTH</u>
Wisconsin	14'	16'	100'
Minnesota	16'	14'	95'
Iowa	12.5'	13'10"	120'
Illinois	Exempt during daytime	No mention	100'
North Dakota	Exempt between sunrise	15'6"	95' or 100' on 4 lane divided hwy

Brotheridge, Kenneth - DOT

From: James Taylor [jtaylor@hillsboroequipment.com]
Sent: Thursday, August 29, 2013 8:28 AM
To: DOT IoHStudyFeedback
Subject: question
Attachments: JohnDeereLogo.gif; stihl_logo_top.gif

The meeting at Cashton was helpful and informative. In conversation with our service manager after attending last night's meeting we both agreed that the DOT was sincerely trying accommodate large machinery on Wisconsin highways.

We have purchased oversize permits for several years for our semi's. The newly proposed thresholds of width are all greater than our present oversize permits. Will there be new, increased oversize permits or do we disregard the purchase of oversize permits when the new thresholds have been implemented?

Thanks.

James L. Taylor VP/GM

Hillsboro Equip., Mauston Equip., Slama's Lawn & Sport

Phone 608-489-2275, 608-847-2020, 608-524-0788



JOHN DEERE

STIHL

www.hillsboroequipment.com

www.hillsboroequipment.net

From: Nick Viney [<mailto:nick@badgerlandgrain.com>]
Sent: Wednesday, August 28, 2013 10:13 PM
To: Rep.Jorgensen
Subject: WisDOT Implements of Husbandry Phase II

Dear Representative Jorgensen,

I have recently moved back to your district to take over our family farm, which has been owned and operated by our family since 1849. It has been brought to my attention that the WisDOT is proposing new burdensome rules for the transportation of implements of husbandry on Wisconsin roads and am writing you to voice my strong displeasure for these proposed rules. These regulations are overly restrictive and create a paperwork nightmare.

The proposed width, height and weight restrictions ridiculous. Many farmers have invested as \$400,000 or more in tractors that will now be too heavy to traverse Wisconsin roads due to proposed 23,000 axle weight limits. Under the proposed rules, I would need a written approval from the governing authority of each road I am to travel and have a filed route plan for each path to be traveled. I could spend months calculating every possible permutation of routes that could be traveled in our farming operation and then attempting to obtain approval from the regulation authority. With local, county, state and federal budgets under pressure, is this really the best allocation of limited resources. While our farm is not large we farm in 3 counties and travel roads in over 25 townships to reach our fields, many multiple times with multiple implements each year and time would require their own written approval. The height restrictions place the burden on the farmer to repair any damage to things like low hanging utility wires, even if they were not hung above the proper height of 13 feet 6 inches, of which I can assure you many are not.

In addition, my children would not be permitted to operate farm equipment on roads before the age of 18 and would be required to have a valid driver's license, even though none to the current drivers testing covers tractor operation and road safety. I have been driving farm equipment on roads since I was 8 years old and have never had an incident. Any issues were caused by lack of caution or impatience of others vehicles on the road and perhaps the answer is to properly instruct our young drives on how best to operate a motor vehicle near farm equipment and not the reverse. Surely farmers aren't that reckless with their equipment if for no other reason than they have invested hundreds of thousands or millions of dollars in this equipment.

The rules proposed by the WisDOT are only the tip of the iceberg, as the maintaining authority can set additional restrictions upon the road travel of farm implements.

My goal when traveling Wisconsin roads is to move from field to field as quickly and safely as possible without causing damage and these proposed rules would do nothing to improve the outcomes.

Thank You for your time!

Nick Viney
Badgerland Grain Farms
10107 W. State Road 59
Evansville, WI 53536
608.219.8383 (mobile)
nick@badgerlandgrain.com
www.badgerlandgrain.com

Brotheridge, Kenneth - DOT

From: Brotheridge, Kenneth - DOT
Sent: Monday, August 26, 2013 4:07 PM
To: DOT IoHStudyFeedback
Subject: IoH Study Comment

Received the following comment on 8/26/2013 and sending to the IoH Study Feedback e-mail address:

This comment is from Darrell Leffel (attendee of the IoH Stratford Town Hall meeting). He suggested leaving the weight limits as it. He said we shouldn't change the weight limits by increasing the weights up to 92,000 lbs. (gross) or 23,000 lbs. (individual axle). Overall, he stated don't change the weight limits and keep the other size limits the same as they are now in statute.

- Darrell Leffel
715-581-7850

Brotheridge, Kenneth - DOT

From: sschleis@charter.net
Sent: Monday, August 26, 2013 3:53 PM
To: DOT IoHStudyFeedback
Subject: farm vehicles

Hello,I would like to make a few comments in regards to your study on farm equipment on roadways.I am a truck driver in the fox valley area and see all kinds of unsafe situations involving farmers and regular traffic.They continue to hold up traffic for what seems miles at some times because the machinery is just to large.i have seen accidents happen because some operate over the center line of roads or even take off peoples mailboxes.Its very frustrating as drivers and it doesnt seem as though the farmers even care one bit as to the problems their creating,not to mention the roads being damaged at the cost of Joe taxpayer.My two suggestions would be to mark major highways as "no farm equiptment routes"and force them to have to use side country roads to get to their destinations as much as possible,even if its farther and takes longer to do.My other idea was to make them all get cdl's and go to their areas(farms,fields,maintenance shops,etc.)with the equiptment loaded on flat bed semis to get to point A to B.Just a few thoughts,I see lots of frustration on the roadways because of traffic being tied up due to these farm vehicles and alot of unsafe conditions...Thanks for your time.

Steve Schleis
530 Ridgeway Dr.
Brillion,WI 54110
920-588-0180
Sschleis@charter.net

Brotheridge, Kenneth - DOT

From: Lorfeld, Tom [Tom.Lorfeld@co.columbia.wi.us]
Sent: Wednesday, August 21, 2013 5:02 PM
To: Rhinesmith, Rory - DOT; Vieth, David - DOT; DOT loHStudyFeedback
Subject: Implements of Husbandry town hall meeting

Rory/Dave/etal –

First, it's great that you and your team are tackling this sticky issue. I commend you for that.

I found the meeting Monday night very interesting. I certainly have concerns about our CTHs as well as our town roads in Columbia County as we are clearly an agricultural county.

In listening carefully to the discussion Monday three things came to mind for me:

- 1 Safety can NOT be sacrificed. A no brainer, few would argue that. But it's a good foundation on which to base the critical need for finally getting something done on this issue.
- 2 We need to strike a fair and reasonable balance between enabling our biggest Wisconsin industry to get their work done and preserving the integrity of our local roads. I think you made this point early on and very well, Rory.
- 3 There is a need to develop a level of mutual respect on this issue between farmers and non-ag. users of our roads. From comments, the farmers clearly feel they are not always respected by other motorists. And from some of their comments and the way they made them, it's evident to me that the converse is also a problem. My suggestion: the Depts of Trans & Ag develop a public information campaign on this issue and base it strongly on safety. Similar to some things that have been done in recent years to promote appreciation and respect for snowplow drivers. Start with respect then work toward cooperation and collaboration and ultimately a final product.

Thanks & good luck on this tough issue,

Thomas Lorfeld, P. E.

Columbia County Highway Commissioner

P O Box 875

Wyocena, WI

608 429-2136 office

608 697-4332 cell

tom.lorfeld@co.columbia.wi.us

Our Goal: Good, Safe Roads

From: Fred Teitgen [<mailto:fteitgen@centurytel.net>]
Sent: Wednesday, August 21, 2013 3:35 PM
To: Lorfeld, Tom
Subject: Fw: Implements of Husbandry Phase II Report

Tom,

Not sure you are aware of this. Go to referenced website for the studies. Major impact on our roads.

Fred

----- Original Message -----

From: R A Schmidt

To: dekorra@centurytel.net ; Fred Teitgen ; gsssdekorra@aol.com ; inkshuly@hotmail.com ; Lynne Clark ; schmidt@charter.net ; Tom Leckwee ; Larry Bechler

Sent: Tuesday, August 20, 2013 10:55 PM

Subject: [Norton AntiSpam]Implements of Husbandry Phase II Report

To All,

Attached is a letter regarding the proposed heavier use of the mammoth Implements of Husbandry (farm equipment).

This possible DOT authorization permitting the heavier limits of this HEAVY equipment will definitely be breaking and busting up the town roads faster than we already can not keep up with.

I do not support this weight increase & there is NOT enough money to repair and maintain the towns roads at this current time already !!!

Displeased, RICK SCHMIDT, Town of Dekorra Chairman & Road Supervisor Columbia County

I completed the survey at: www.dot.wisconsin.gov/business/ag/index.htm and entered the above caption per say.

RICK

Notice: This email is on a publicly owned system, subject to open records (sec. 19.21, et seq.) and archival (sec. 16.61, et seq.) requirements under Wisconsin State Law.

Brotheridge, Kenneth - DOT

From: Fred Teitgen [fiteitgen@centurytel.net]
Sent: Wednesday, August 21, 2013 10:57 AM
To: DOT loHStudyFeedback
Subject: Comments on Implements of Husbandry Reports Recomendations

Dear DOT,

I have read the above referenced reports recommendations, and while I am a strong supporter of the state's farmers and agriculture, I must say that I am flabbergasted and totally disagree with allowing very heavy farm equipment to travel unregulated on town roads, which are not generally designed for these heavy loads, and which will result in premature deterioration and very high road repair and replacement costs to towns, who cannot even afford to keep in proper repair their roads under current conditions.

I am a former Town Chairperson and have been heavily involved in the rating and repair of the Town of Dekorra roads for the last 10 years.

Sincerely,
Fred Teitgen
Columbia County Board Supervisor
Town of Dekorra Roads Committee Member

Brotheridge, Kenneth - DOT

From: Michael Irish [Michael.Irish@landoll.com]
Sent: Wednesday, August 21, 2013 8:30 AM
To: DOT IoHStudyFeedback
Subject: Farm Equipment Operating Widths

Regarding the section of the study relating to the maximum width of farm equipment.

The overall width of most popular pieces of equipment we manufacture is 17'6".

My engineering staff spends significant time trying to design machines with the narrowest transport width possible. The magic number appears to be 17'6". It is physically impossible to design folding equipment required by todays farmers into anything narrower.

I would recommend the max size be raised to 17'6".

Best regards:

Michael Irish
General Manager
Brillion Farm Equipment
Landoll Corporation
Brillion, WI 54110
Office: 785 562 4607
Mobile: 920 418 0320
michael.irish@landoll.com

Brotheridge, Kenneth - DOT

From: Kenrick Womack [kenrick@kwomackproperties.com]
Sent: Monday, August 19, 2013 1:03 PM
To: DOT IoHStudyFeedback

Hello,

I will not be able to attend any meetings. I feel it is important to voice a concern. We live in rural Columbus and travel many country roads like HWY DM from 60 to 51. Many times especially during planting and harvest equipment is rolling down the roads. Equipment that is at time almost $\frac{3}{4}$ as wide as both lanes. Most equipment is going up blind hills on both sides of the center line. When an oncoming vehicle comes it is hit the ditch or get KILLED.

I feel it is imperative before people get killed that you implement immediately the requirement for a warning vehicle in front and behind with lights and warnings of danger of a wide ag implement for any vehicle wider the lane of traffic. At least we will have a chance to avoid safely. When I asked a good farmer friend he stated that WI law is such that ag equipment has right away and regardless of being over the center line it is my responsibility to avoid at all costs. Not certain if this is true but I feel it is an immediate need to have flaggers and you do oversize big rigs on the highways before a family is killed.

You can call me on the cell if you have questions.

Kenrick Womack
608-669-5077

Good evening, my name is Tim O'Brien. I am an attorney at Bakke Norman Law Office. Our office represents many farm clients, as well as numerous towns and villages, which gives us a keen interest in the work of this committee

In 1998, I represented a farmer cited for failing to register his farm vehicle. When cited, he was driving a tractor pulling a manure wagon from the main farm to a field he owned approximately 10 miles away. We argued the vehicle combination was an implement of husbandry. The judge agreed the vehicles were designed for agricultural purposes, were being used exclusively in agricultural operations, and, despite the 10 mile trip from farm to field, were being used principally off the highway. Therefore, he found the vehicles were implements of husbandry and dismissed the citation.

Fast forward to 2012. Another farmer is transporting manure from the home farm to be spread on his fields. Instead of a tractor and wagon, he is using a truck that has been modified so that its primary purpose is hauling and spreading manure. The farthest field is located about 8 miles away. He too is cited, this time for being overwidth, as the field tires and gear system placed on the vehicle for purposes of spreading manure bring the vehicle outside the statutory 8'6" requirements. We again argue the vehicle is an implement of husbandry. The judge agrees the vehicle was designed for agricultural purposes. He agrees that

transporting and spreading manure was use in an agricultural operation. However, he found that because the operation on the roadway was more than “de minimus,” the vehicle was not being used principally off the highway. Therefore, the vehicle was not an implement of husbandry, and the farmer was found guilty. 2 cases.

Similar facts. Opposite results.

Your proposed changes to the statutory definitions attempt to remedy this situation. The proposals appear to be on the right track. But I ask you to consider a couple of things. Under the proposed changes, an implement of husbandry must be used “exclusively in the conduct of agricultural operations.” In the Commercial Motor Vehicle section, it further states that use, even temporarily, for non-agricultural purposes, shall disqualify the vehicle from being considered an implement of husbandry. In the 2d case I described, the vehicle had been modified with a moving floor and a beater system for spreading manure. The vehicle could also be used for other purposes if necessary, such as transporting rocks, building materials or farm products. Some would argue all of these are related to the conduct of agricultural operations; others may disagree. My request is you consider whether the way the vehicle is being used in a specific trip should be determinative, as this would allow a properly licensed CMV operator to use the vehicle for non-agricultural purposes. Alternatively, consider whether there should

be a more precise definition of the phrase "exclusively in the conduct of agricultural operations."

The 2d, and I believe more important issue, relates to the "off the highway" language. Under current law, the statute uses the phrase "principally off the highway" to determine whether a vehicle qualifies as an implement of husbandry. The word "principally" is not defined in the statute, which led directly to the 2 court cases I described above. The newly proposed statute uses the word "primarily" to describe the off road use. While better than the term "principally," the proposed statute does not define "primarily." I urge you to clarify what is meant. Perhaps the addition of language stating that it shall be presumed that operation on the highway to travel from one portion of an agricultural operation to another portion of the agricultural operation means the vehicle is being used primarily off the highway.

In closing, I commend you for the work you are doing. There are many competing interests here, but the goal should be uniformity and simplification. While it may be good for Bakke Norman's business, farmers, manufacturers and implement dealers should not need an attorney to understand the law. Thank you.

August 30, 2013

Rory Rhinesmith
Wisconsin Department of Transportation

Re: Conversation at Town's Association Meeting on August 19, 2013

Dear Mr. Rhinesmith:

I'm Jim Schwartz from Dane, WI. I want to **Thank You** for hearing me out after the Town's Association Meeting held in Madison on August 19 at UW Extension, 5201 Fen Oak Ct.

At that time I talked to you about my brother's problem with his milk hauling service. Just to refresh your memory, he bought a 6,000 gal. tank which he was with the understanding he could weigh out at an 80,000 lbs. weight limit.

This spring he was picked up and given a ticket for nearly an \$800.00 fine and was told he could only max out at 75,000 pounds because of his axel spacing. The problem he has encountered now is that his last farm could go up and down 1,500 pounds a day (which this farmer gets 33,000 pounds per day); so if he goes into the farm with 12,000 pounds in his tank, he could be overweight by 1,500 pounds.

The Dept. of Ag tells us we have to pick all milk up before the farmer milks again (he milks 3 times a day) which is about 1½ hours after we pick up the milk. The trip to the plant is 1 hour each way plus an hour of unload time so it doesn't work out.

The fine is about \$2,000.00 from the Dept. of Ag. So his problem is being overweight or face fines from the Dept. of Ag. We have 95% of the loads legal. So now we have to figure out how to take care of the overloads.

Is there a chance that this weight limit can be raised when we run into this situation? My brother said he would gladly pay \$1,000.00 a year more registration and license fee. Also when you run down the highway with a load 80% full, it is more dangerous to try to stop when somebody pulls out in front of you.

When he had to cut his load 5,000 pounds a load, his profits went out the window so it is pretty hard to stay in the business.

Thank you for hearing me out.

My brother's info – Tom Schwartz at 608-225-0454—if you would like to speak to him directly.

Hope to hear from you soon.

Thank you again.

Jim Schwartz
510 High St.
Dane, WI 53529
608-712-5947

Implements of Husbandry Study

Phase II Addendum Report to the Secretary of the Wisconsin Department of Transportation

Website: <http://www.dot.wisconsin.gov/business/ag/index.htm>

Contact: IoHStudyFeedback@dot.wi.gov

Wisconsin Department of Transportation
Hill Farms State Transportation Building
4802 Sheboygan Ave.
P.O. Box 7910
Madison, Wisconsin 53707-7910